## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

H. CRISTINA CHEN-OSTER; SHANNA
ORLICH; ALLISON GAMBA; and MARY DE
LUIS,

Plaintiffs,

V.

GOLDMAN SACHS & CO. and THE
GOLDMAN SACHS GROUP, INC.,

Defendants.

## DECLARATION OF ROBERT J. GIUFFRA, JR.

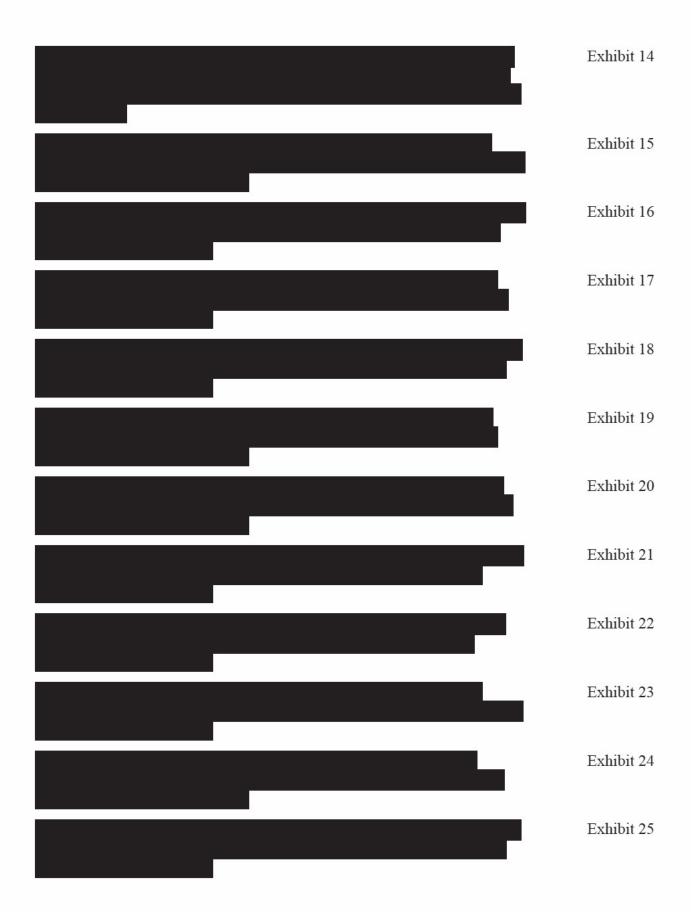
- I, Robert J. Giuffra, Jr., pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury as follows:
- 1. I am a partner of Sullivan & Cromwell LLP, attorneys for Defendants in this action and a member of the Bar of the State of New York. I make this Declaration to place before this Court certain documents and information referenced in Defendants' Memorandum of Law in support of their Motion to Stay the Claims of Certain Class Members, to Exclude Them from the Class, and to Compel Them to Arbitration.
- 2. Attached hereto as Appendix A is a summary of information related to operative Separation Agreements compiled from (i) Exhibits 1–866; (i) Exhibit 1 to the Declaration of Michael Becker, dated April 12, 2019 ("Becker Declaration"); and (iii) other voluminous data previously produced to Plaintiffs by Goldman Sachs related to class members' effective dates of hire.

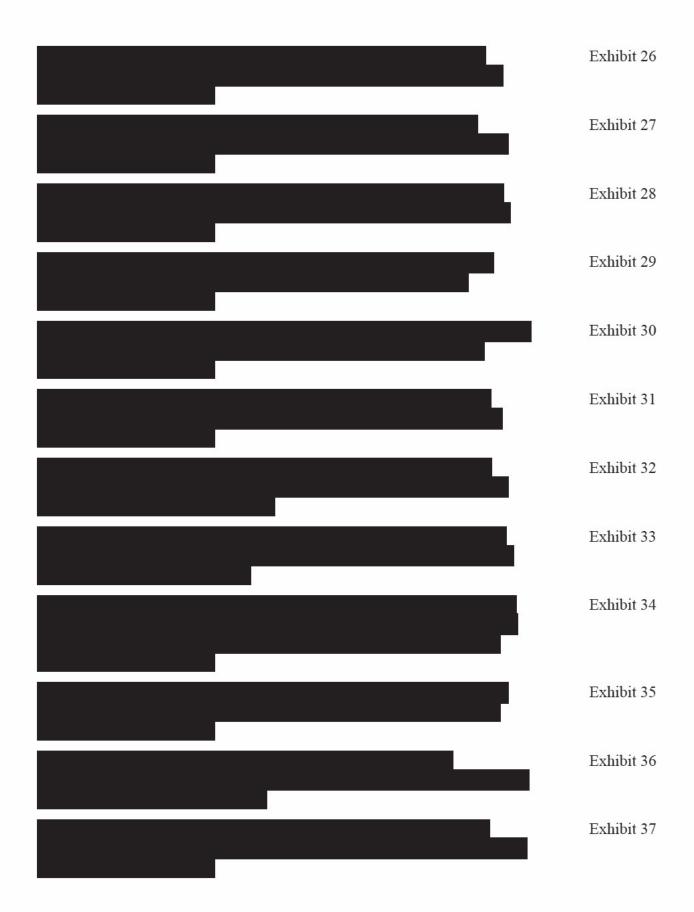
- 3. Attached hereto as Appendix B is a summary of information related to 201 operative Managing Director Agreements compiled from (i) Exhibits 867–1096; (ii) Exhibit 1 to the Becker Declaration; and (iii) other voluminous data previously produced to Plaintiffs by Goldman Sachs related to class members' effective dates of hire.
- 4. Attached hereto as Appendix C is a summary of information related to 187 operative Private Wealth Advisor Agreements compiled from (i) Exhibits 1097–1284; (ii) Exhibit 1 to the Becker Declaration; and (iii) other voluminous data previously produced to Plaintiffs by Goldman Sachs related to class members' effective dates of hire and dates of performance reviews.
- 5. Attached hereto as Appendix D is a summary of information related to 694 operative Equity Agreements compiled from (i) Exhibits 1285–1289; (ii) Exhibit 1 to the Becker Declaration; (iii) Exhibits 2–25 and 60 to the Declaration of Eric Dias, dated April 12, 2019; and (iv) other voluminous data previously produced to Plaintiffs by Goldman Sachs related to class members' effective dates of hire.
- 6. Attached hereto as Appendices E-1 to E-7 are summaries of information derived from Appendices A, B, C and D, namely:
  - (a) Appendix E-1 is a summary of 647 operative Agreements to arbitrate executed before the filing of the Complaint on September 15, 2010;
  - (b) Appendix E-2 is a summary of 67 operative Private Wealth Advisor Agreements executed after the filing of the Complaint, but prior to the class member's effective date of hire at Goldman Sachs;

- (c) Appendix E-3 is a summary of five operative Private Wealth Advisor Agreements executed after the filing of the Complaint, after the start of the class member's effective date of hire, but prior to her first performance review;
- (d) Appendix E-4 is a summary of 46 operative Separation Agreements and Managing Director Agreements executed after the filing of the Complaint by class members who had previously executed an arbitration agreement before the filing of the Complaint;
- (e) Attached as Appendix E-5 is a summary of operative Separation Agreements incorporating by reference arbitration clauses in previously executed Managing Director Agreements;
- (f) Attached as Appendix E-6 is a summary of 18 operative Separation Agreements executed by class members with individual counsel;
- (g) Attached as Appendix E-7 is a summary of 515 class members who executed multiple Equity Agreements.
- 7. Attached hereto as Appendix F is a summary of all references made by both Plaintiffs and Defendants to agreements to arbitrate in Exhibits 1452–1475 and in other publicly filed documents.
  - 8. Attached hereto are true and correct copies of the following documents:







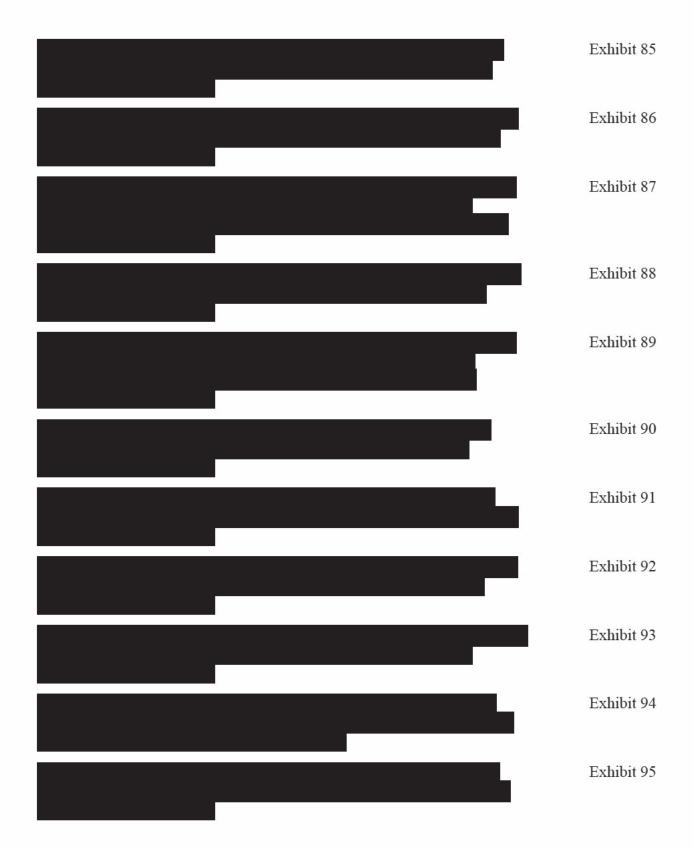


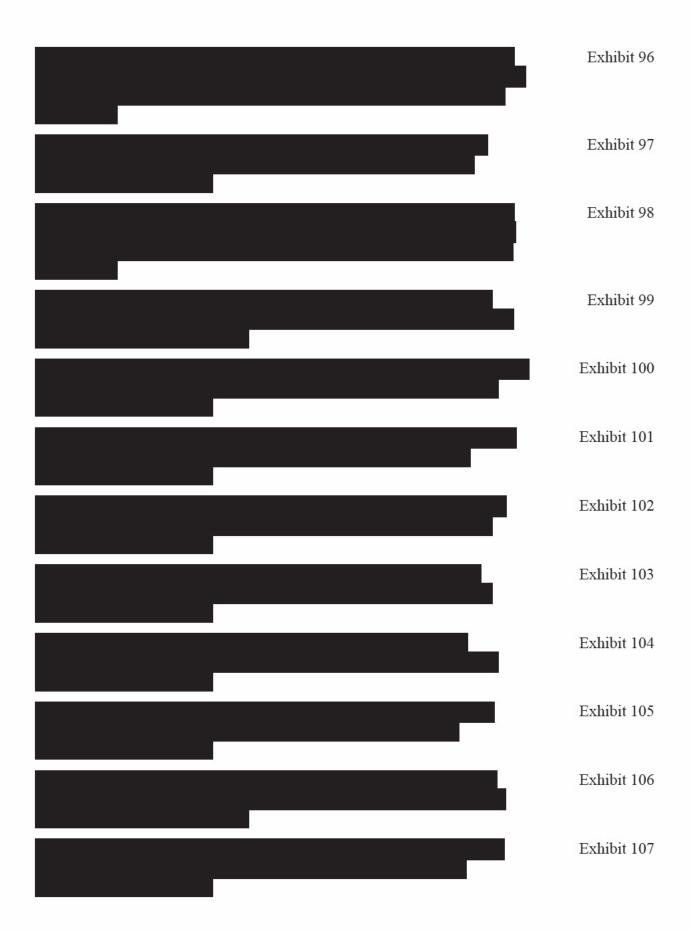


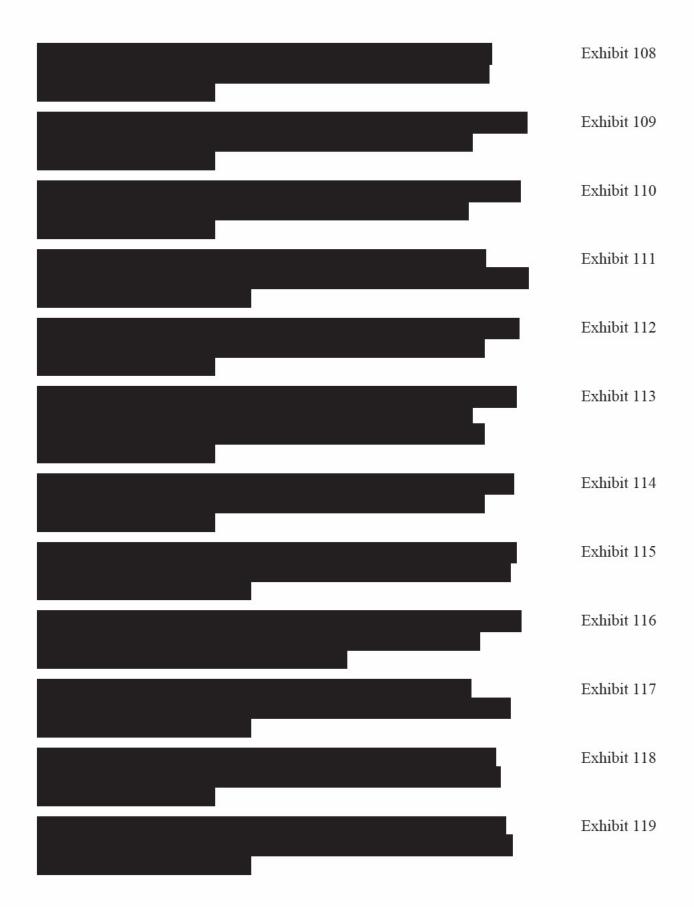


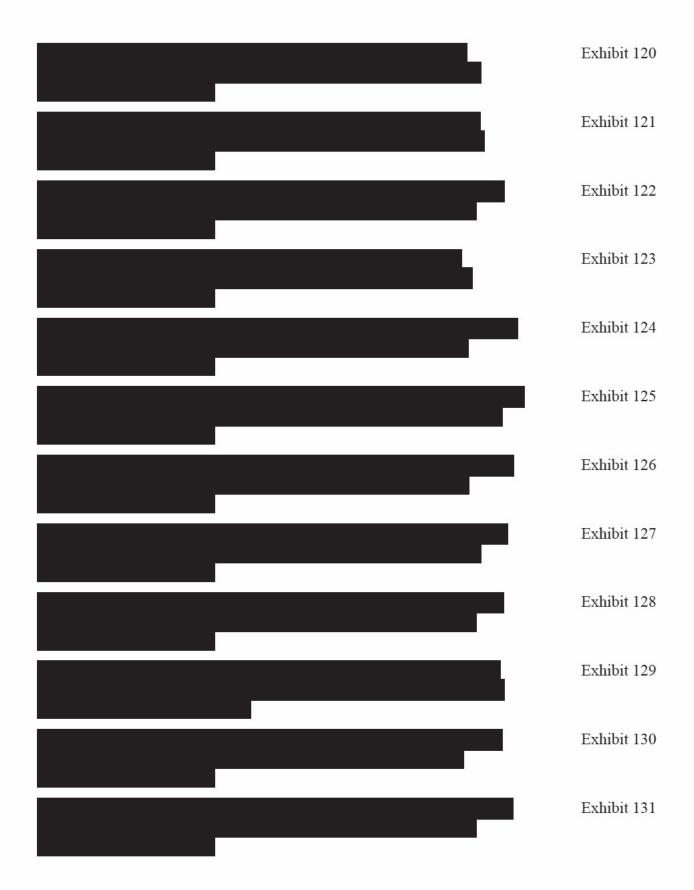


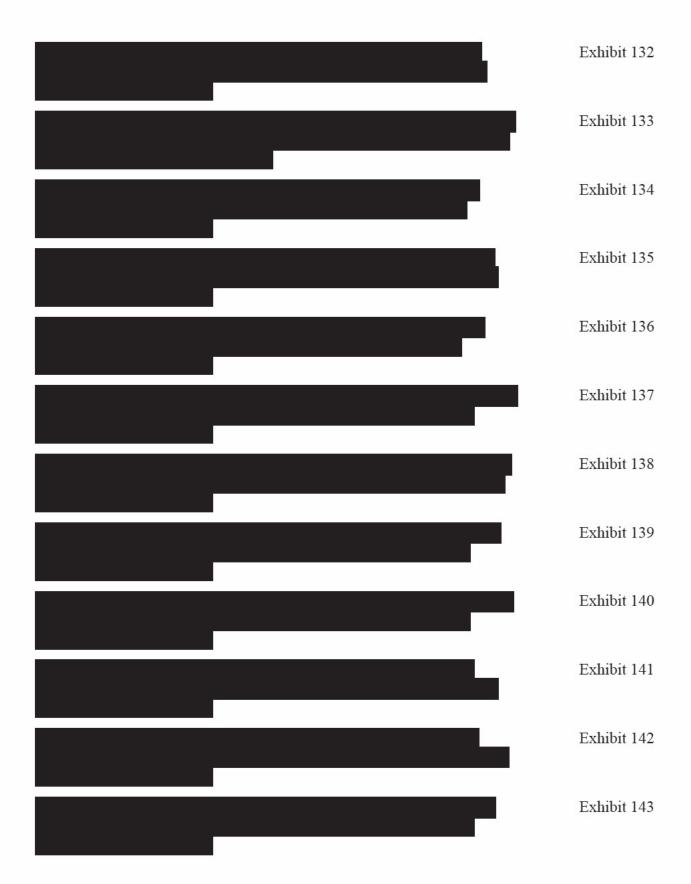


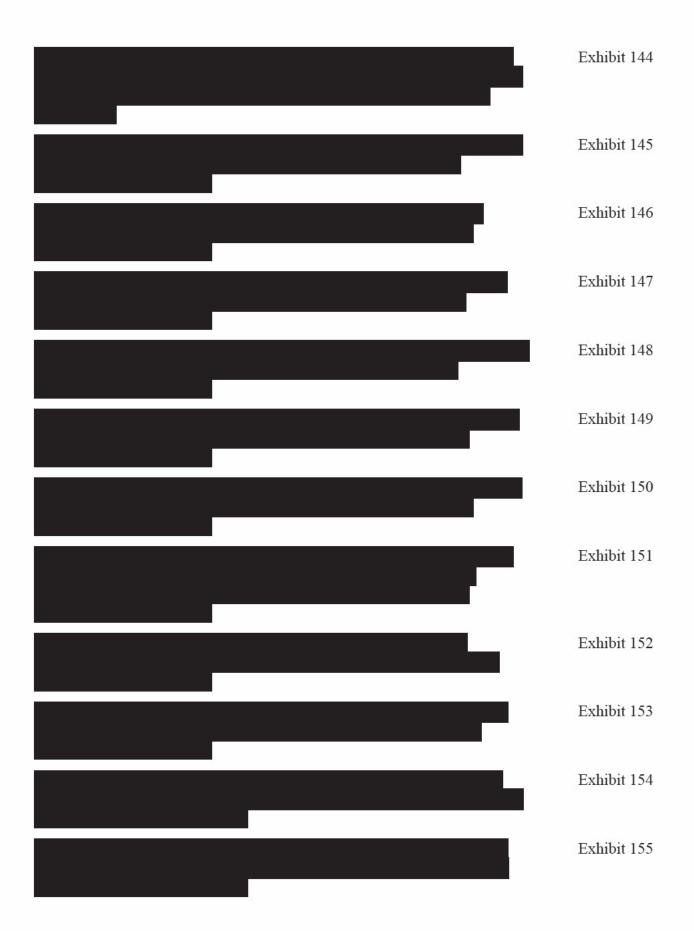


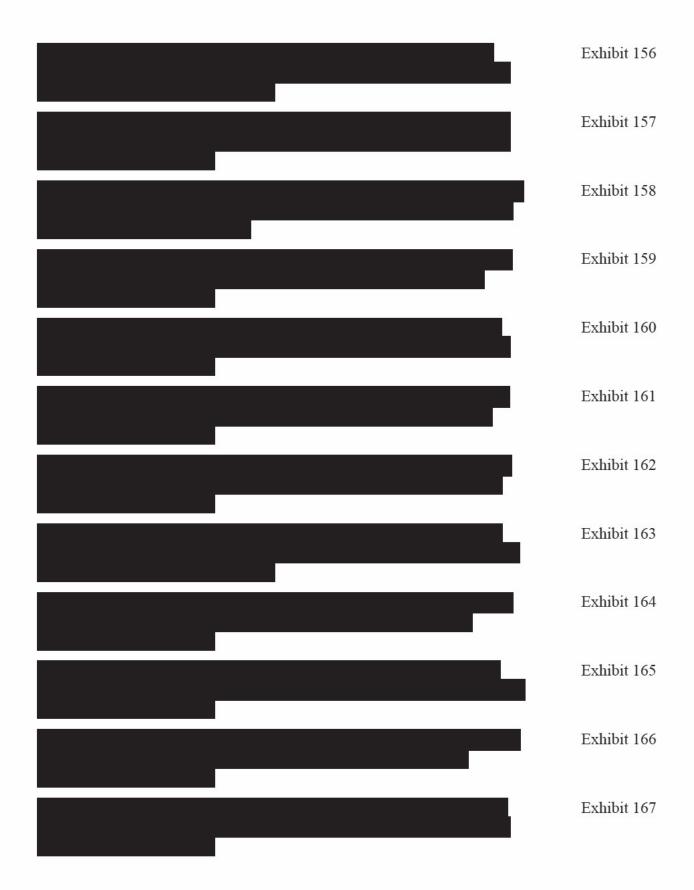


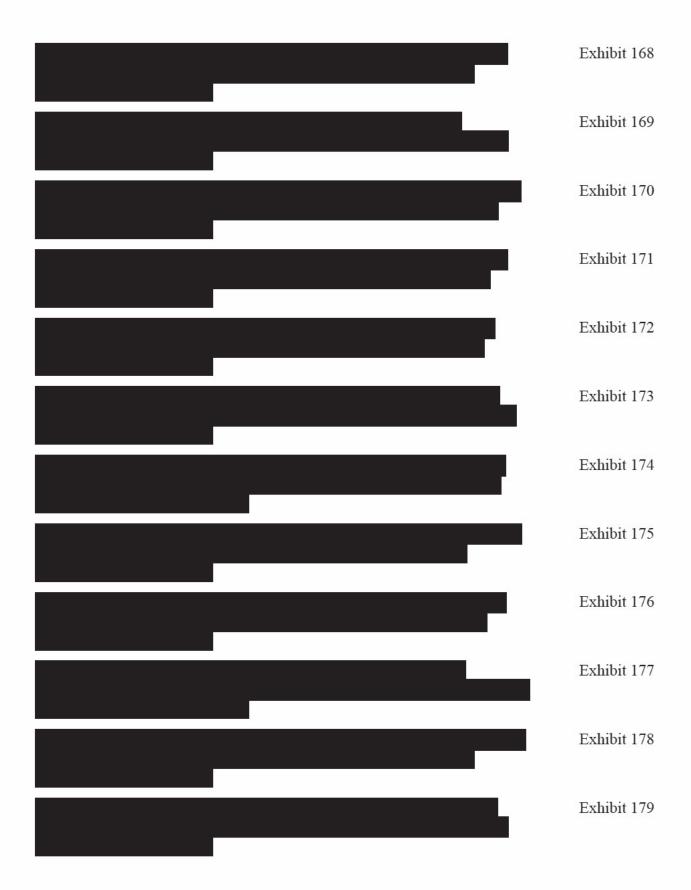




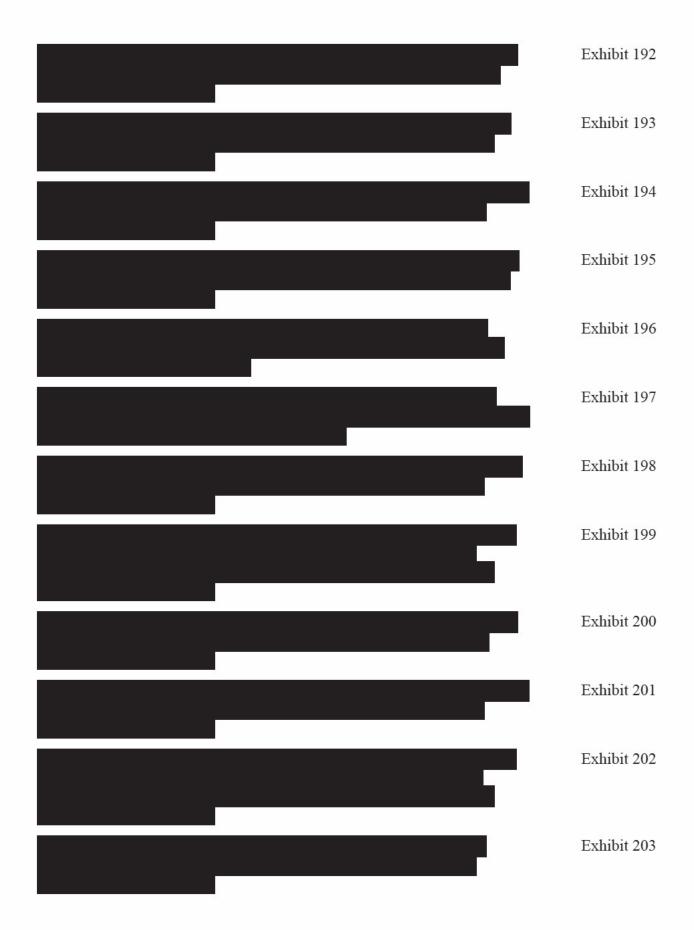




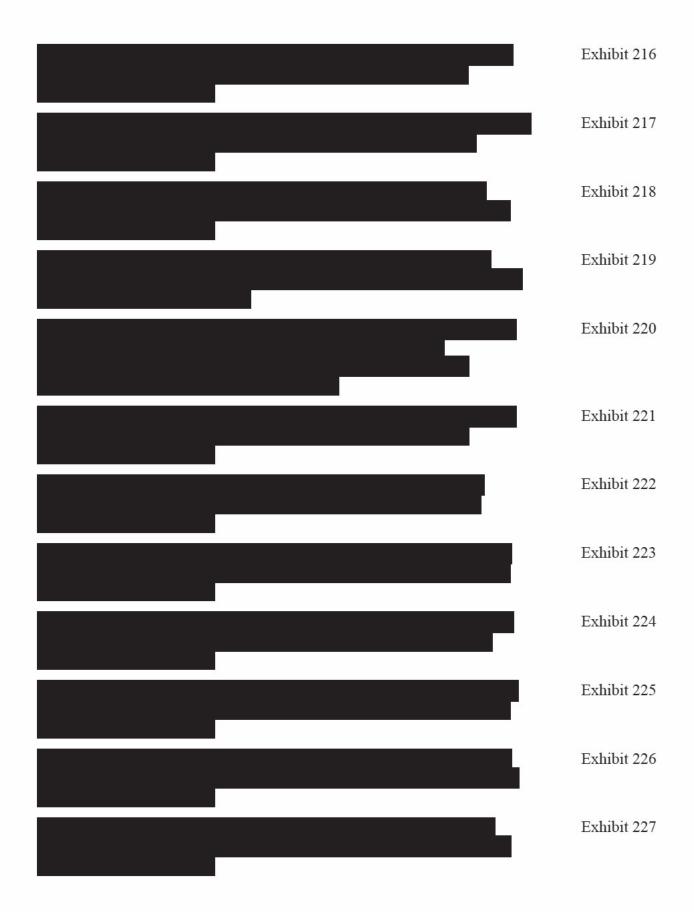


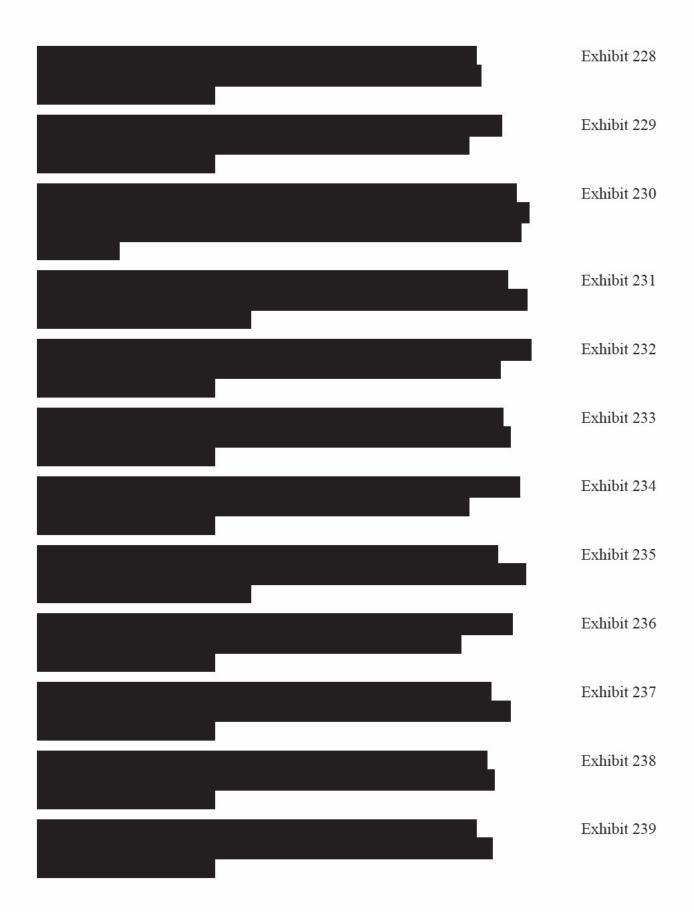


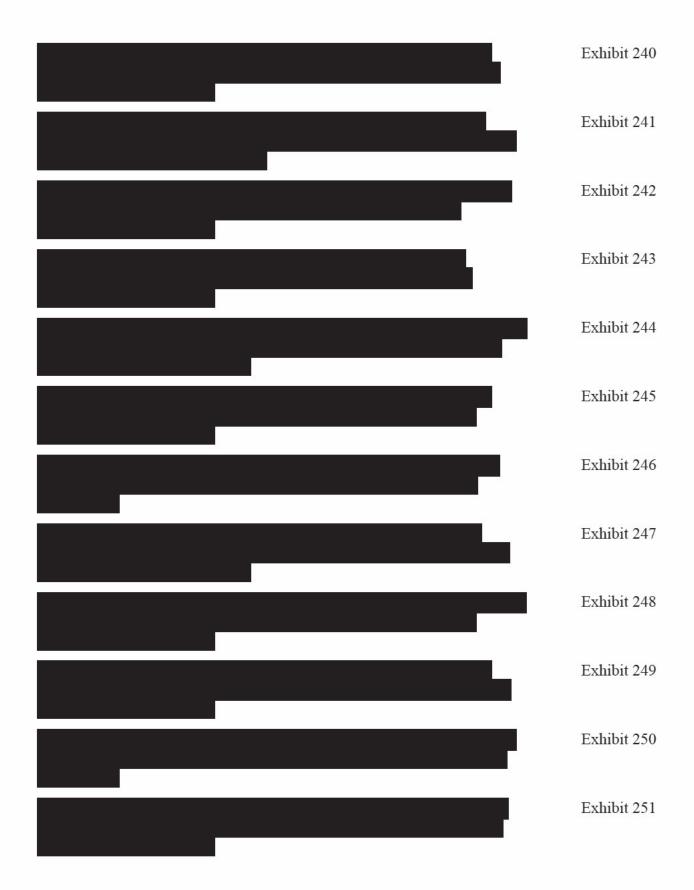


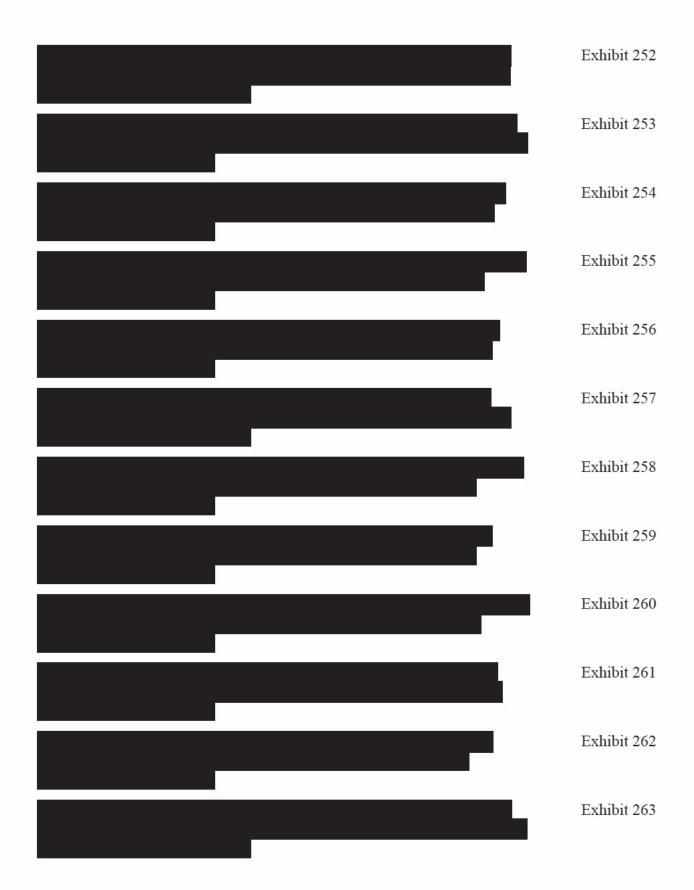


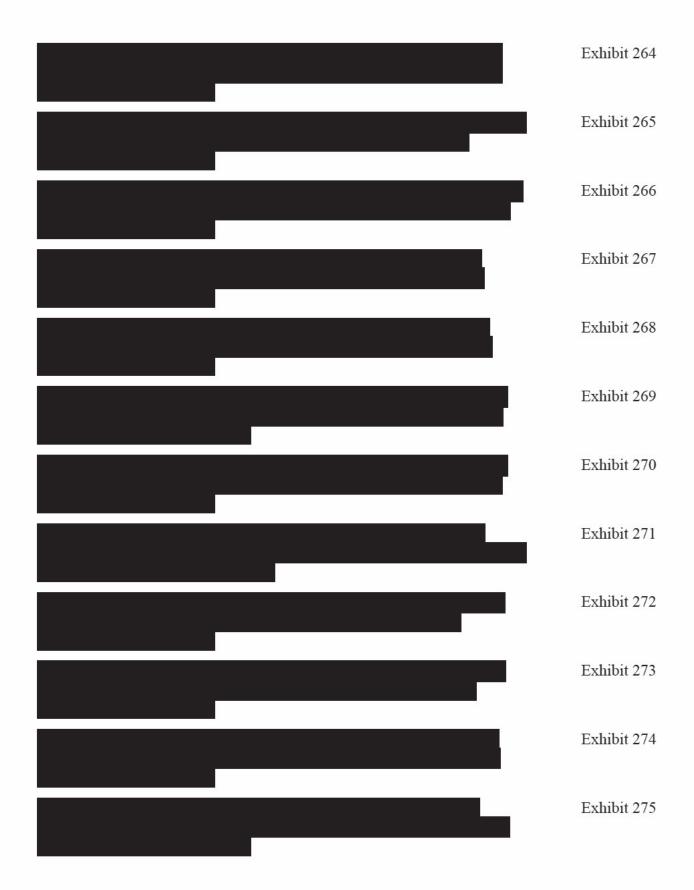




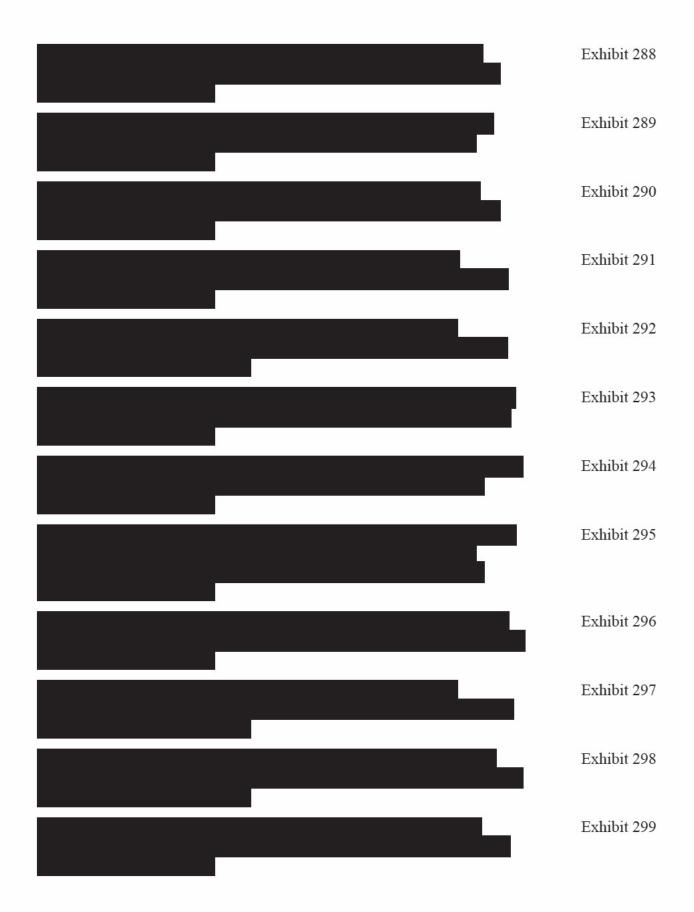


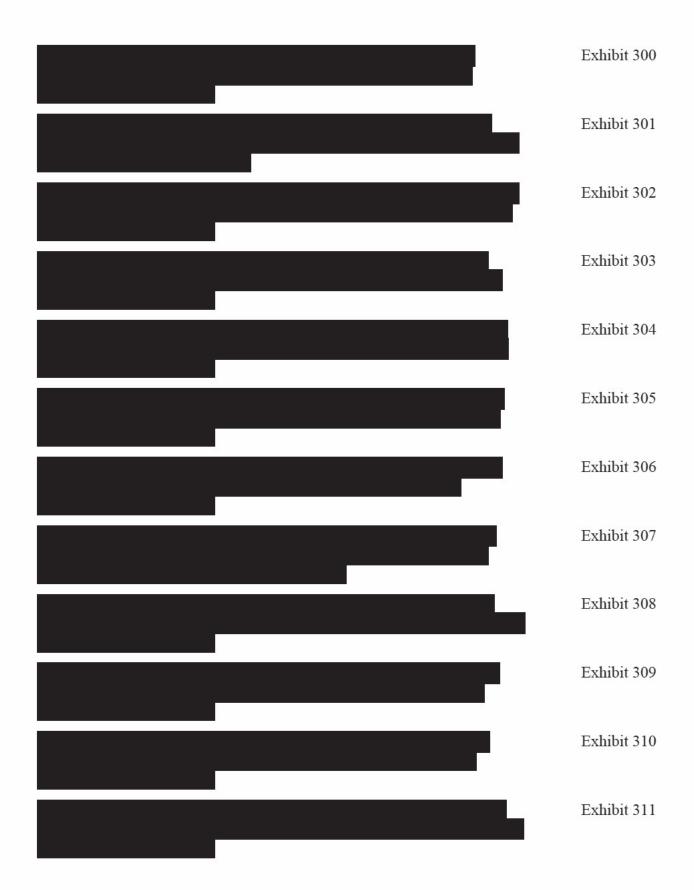




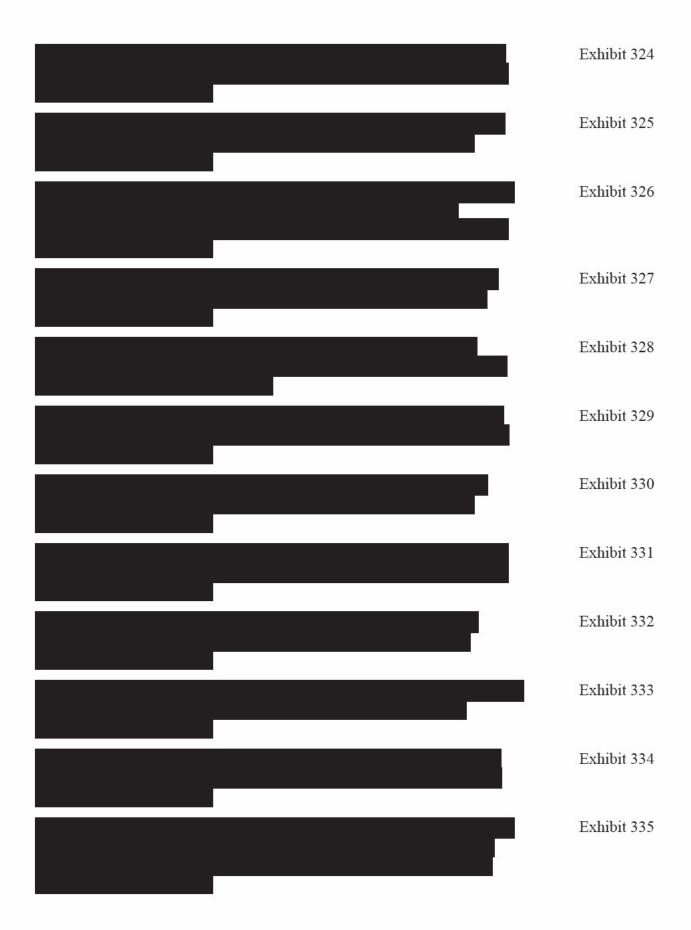


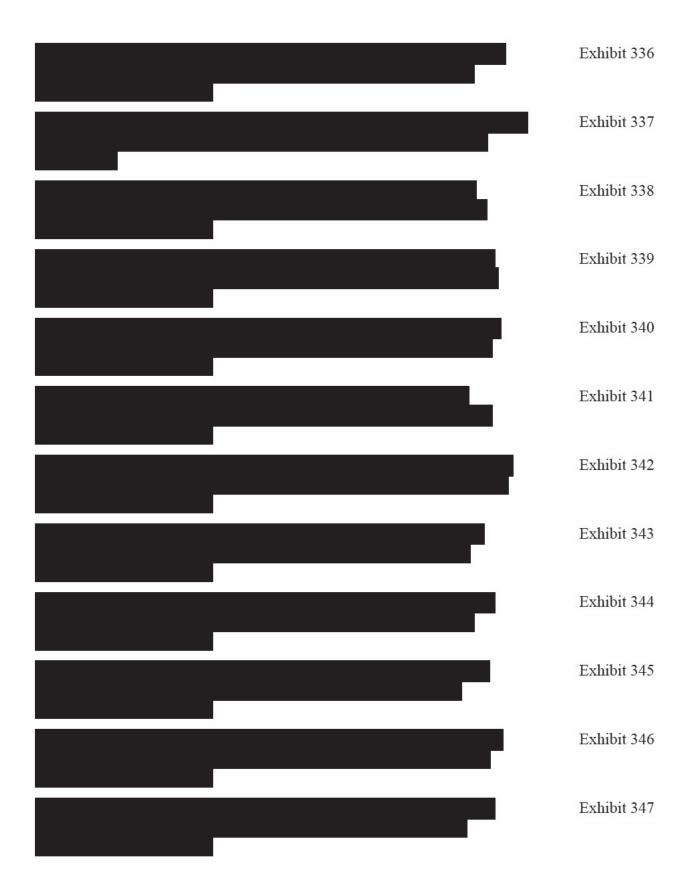


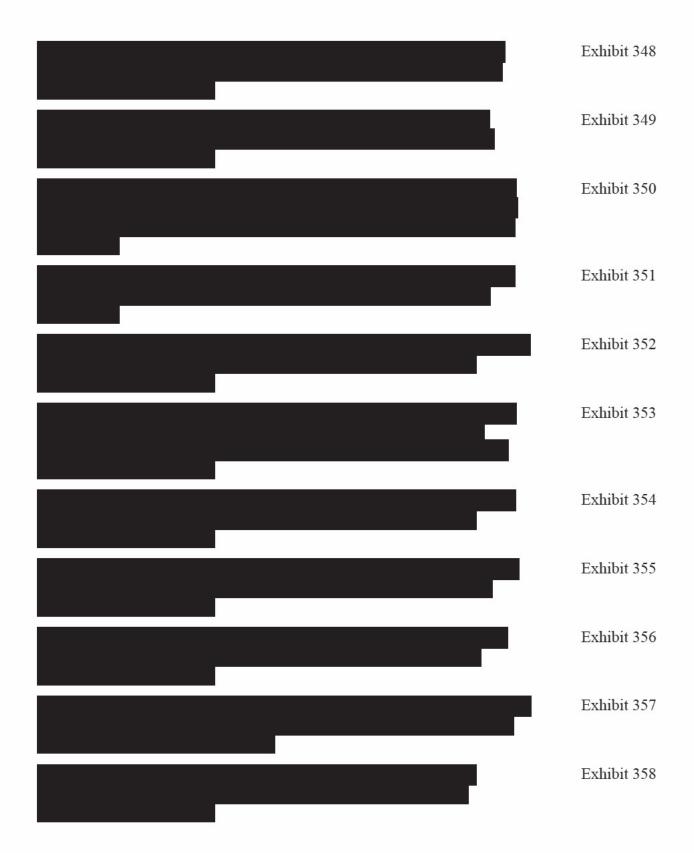


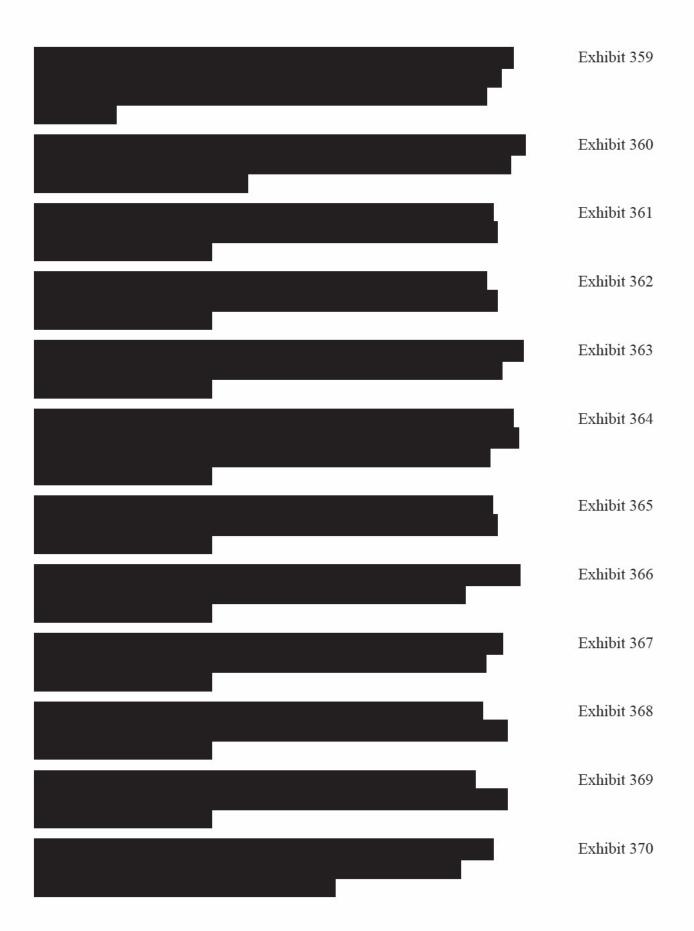


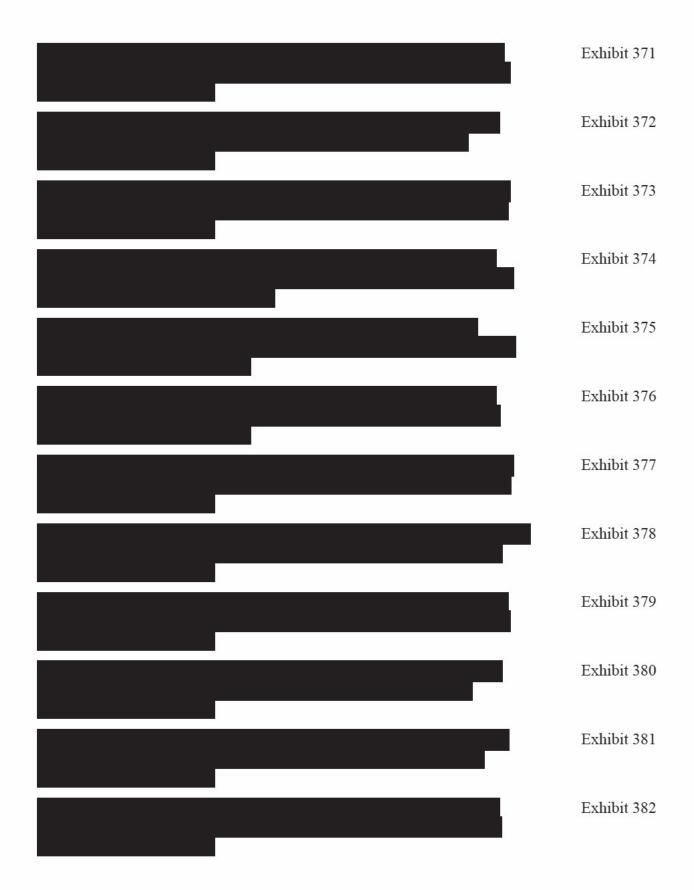


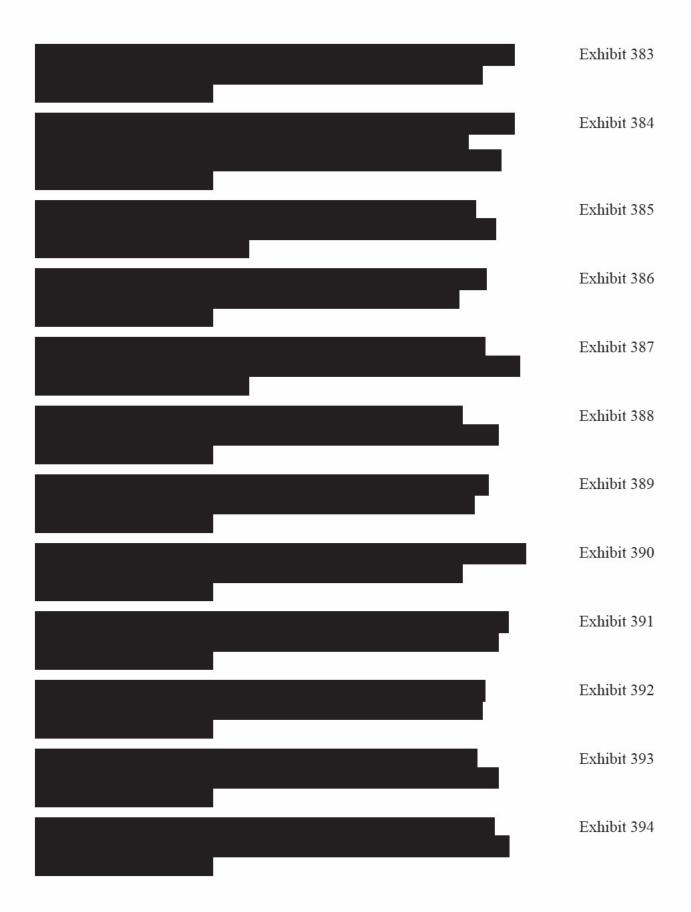


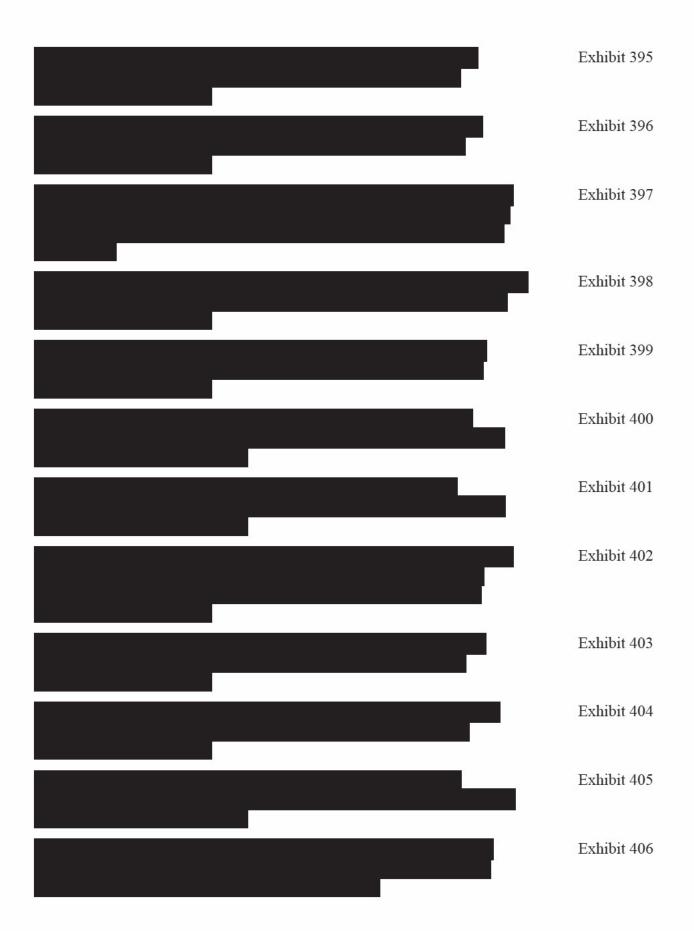


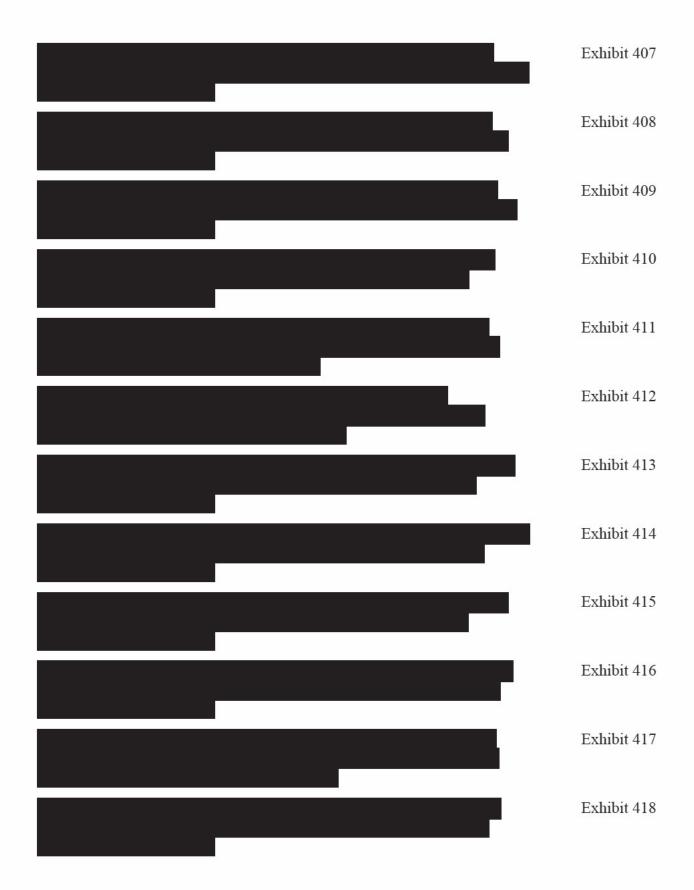




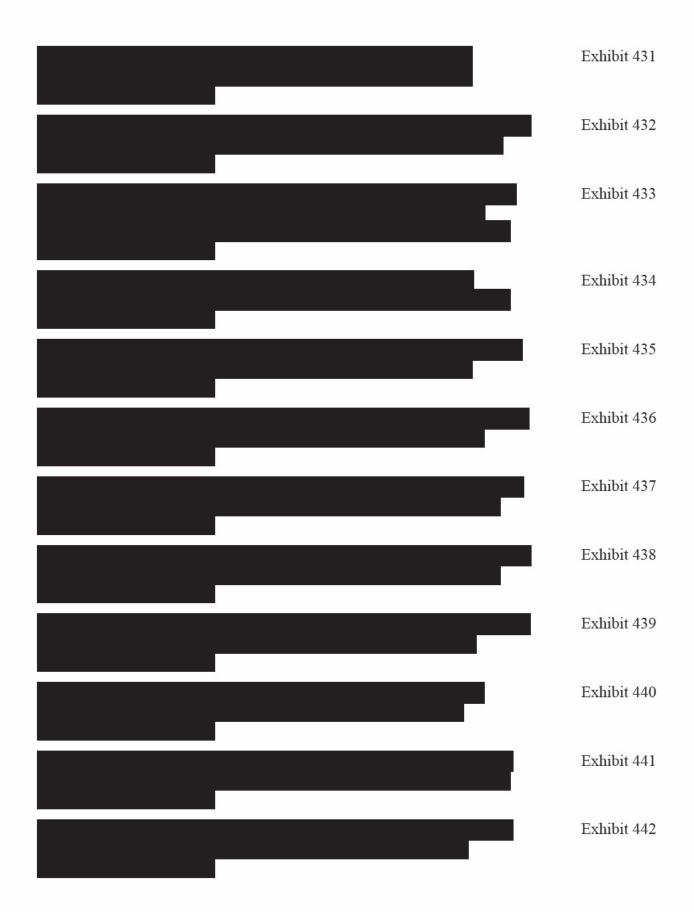


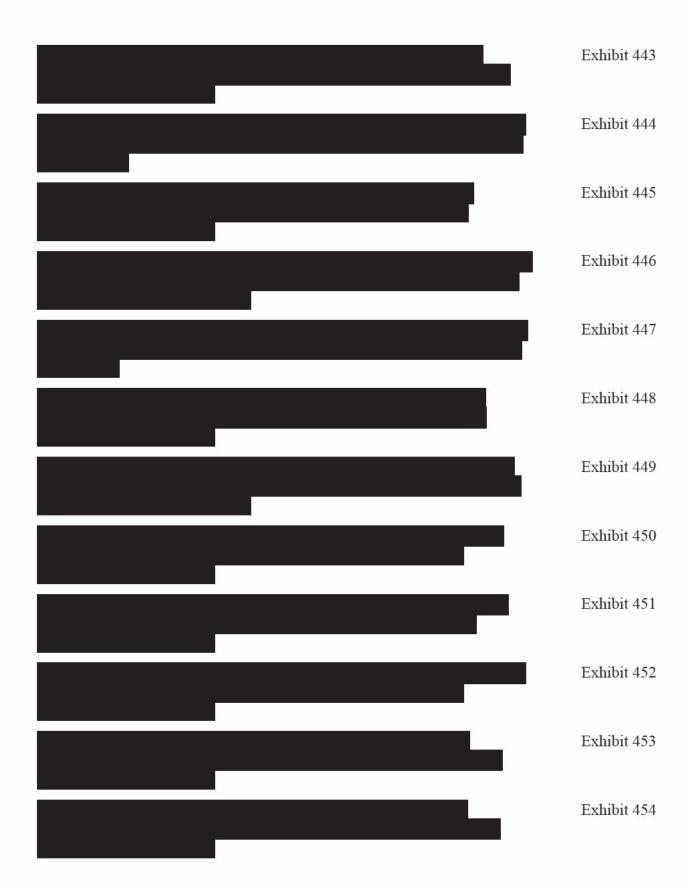




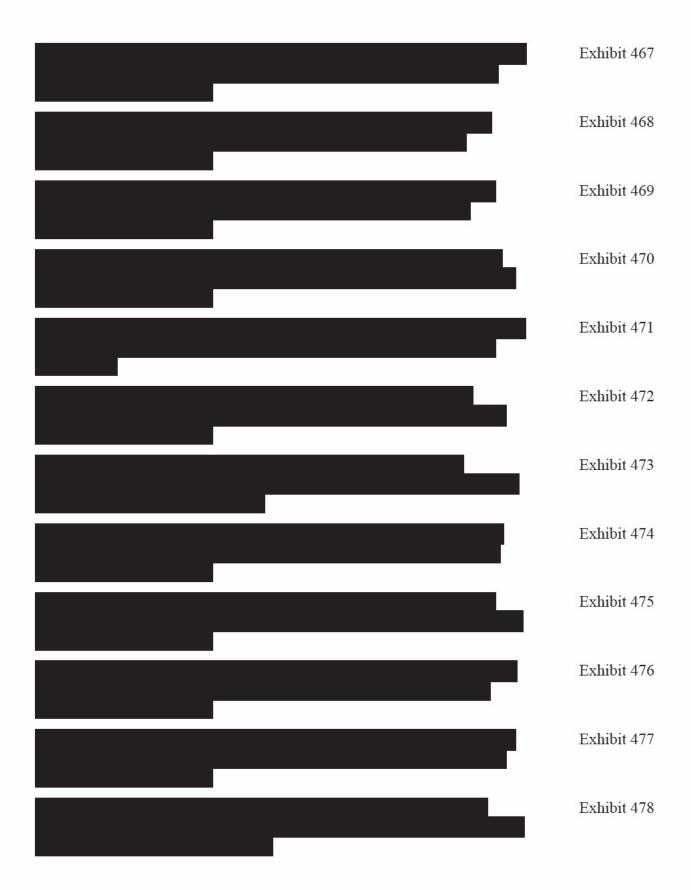


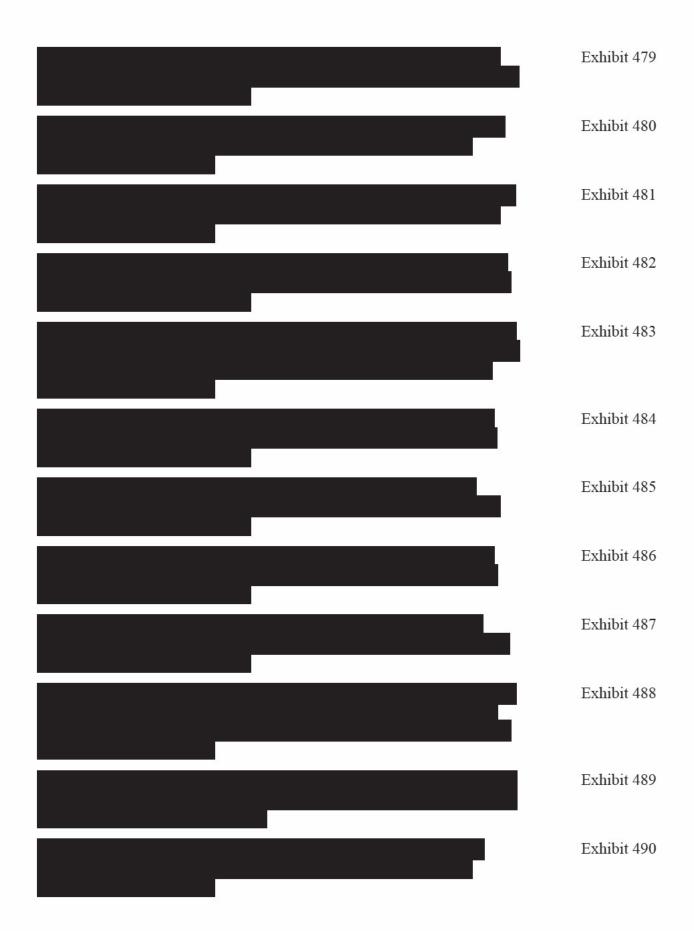


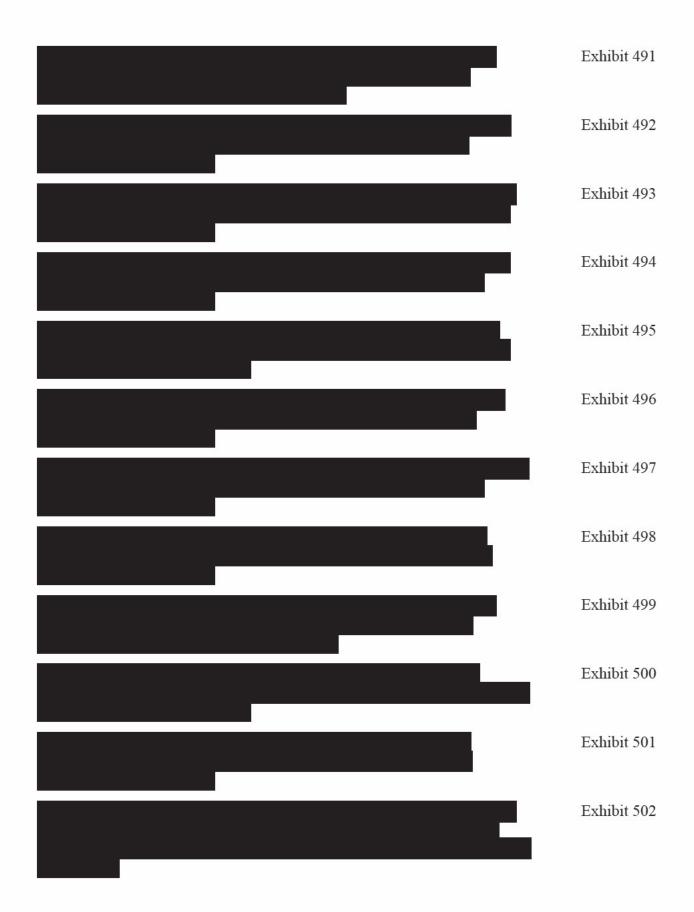


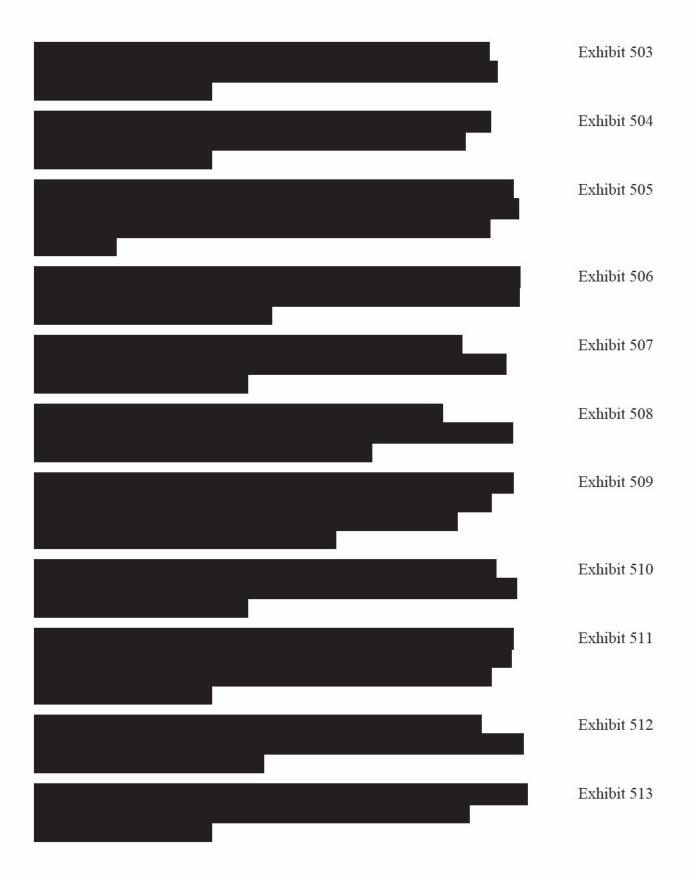




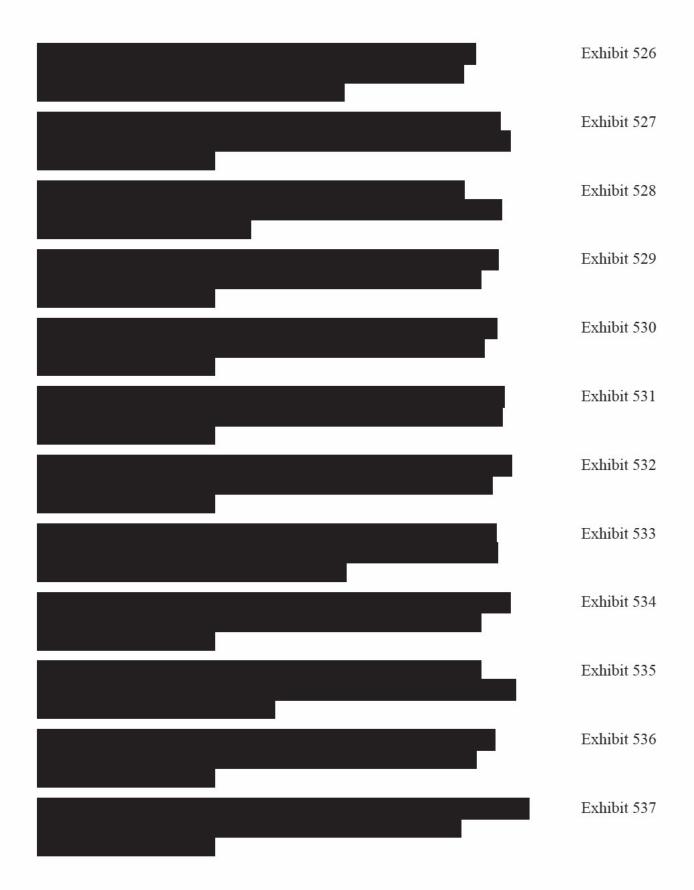


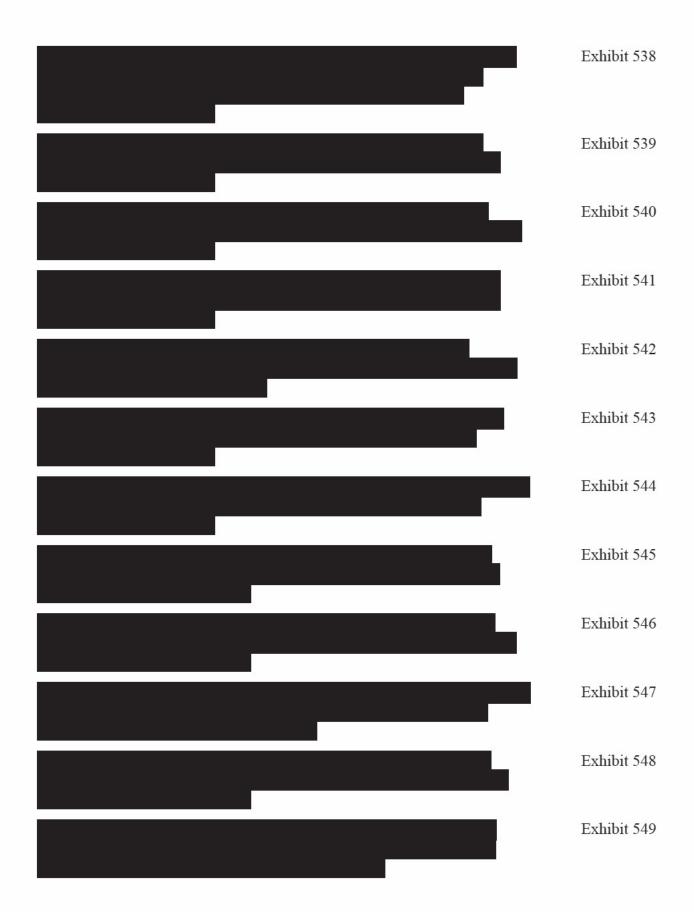


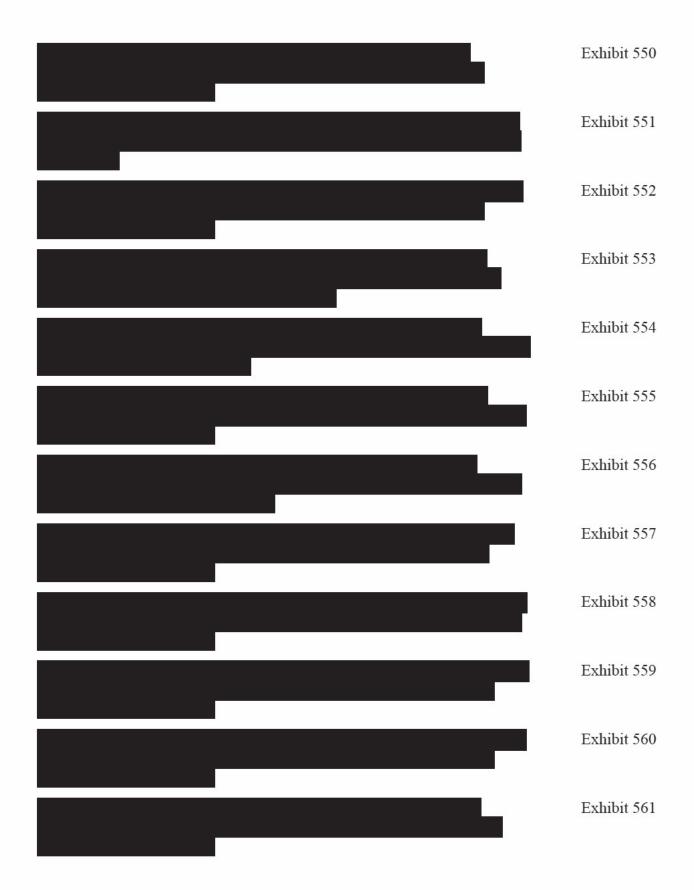




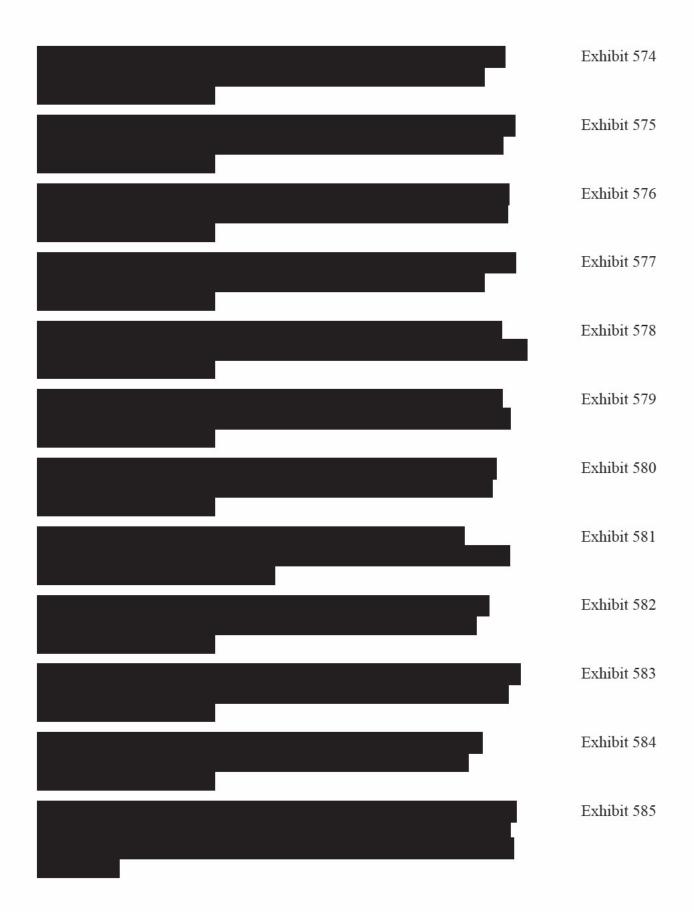


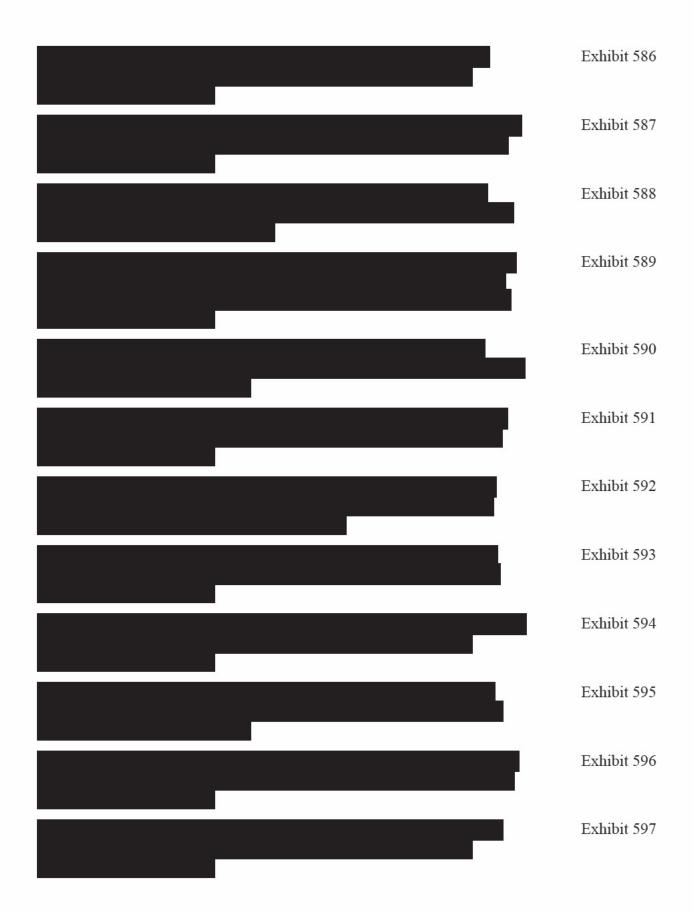


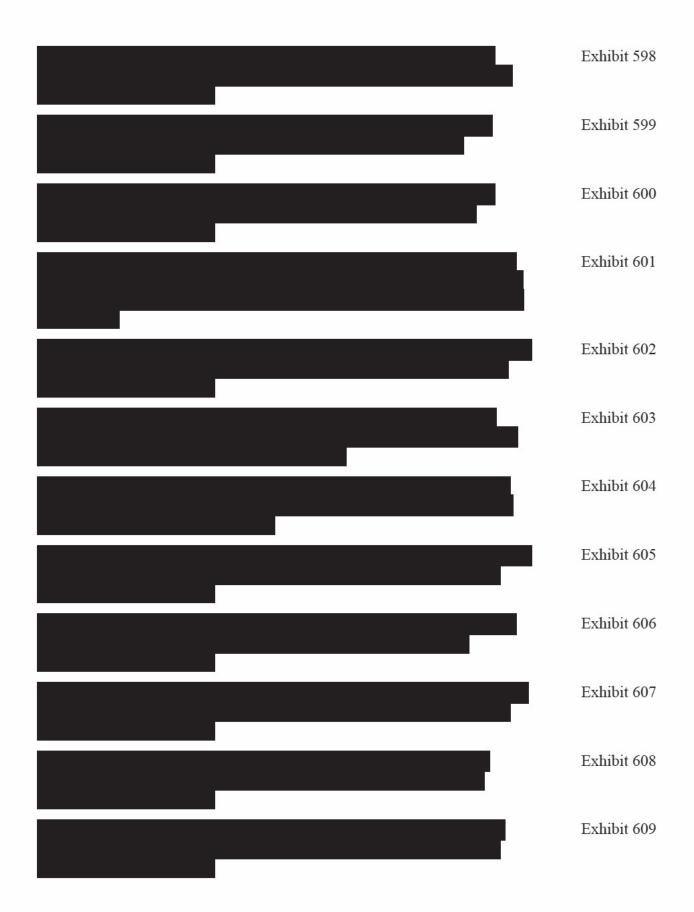


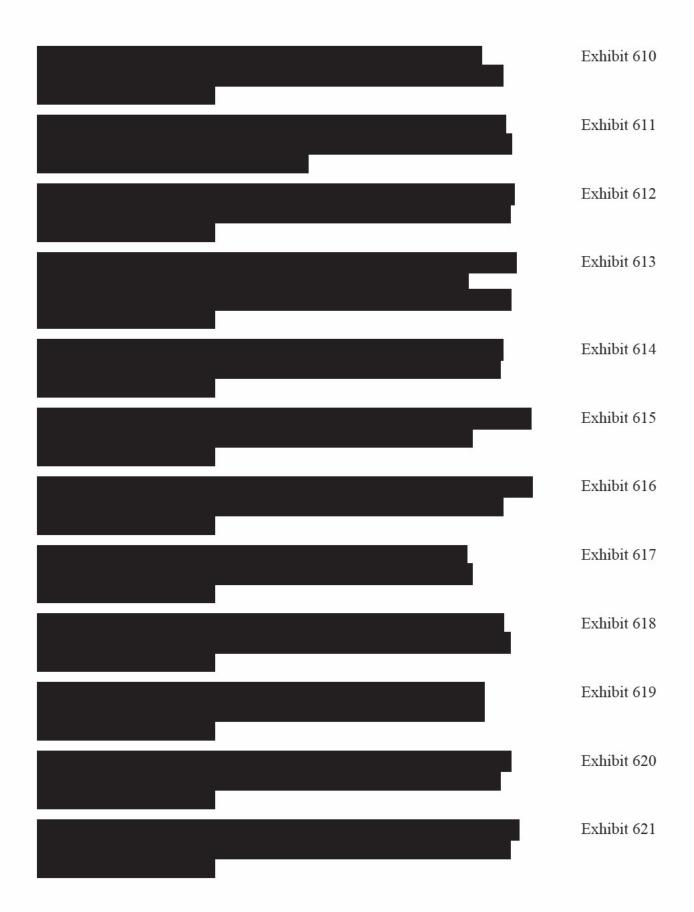


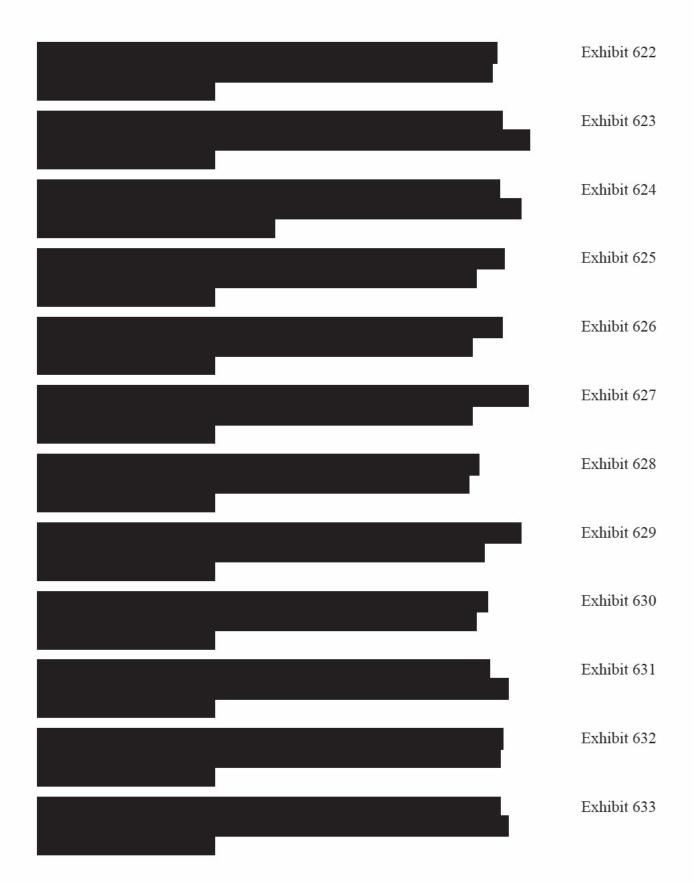


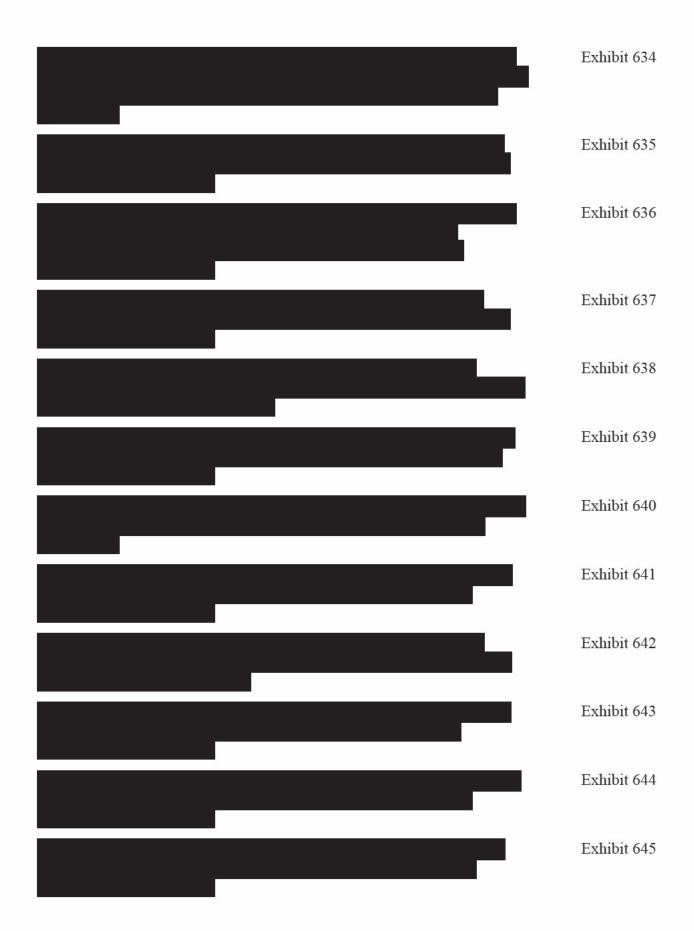


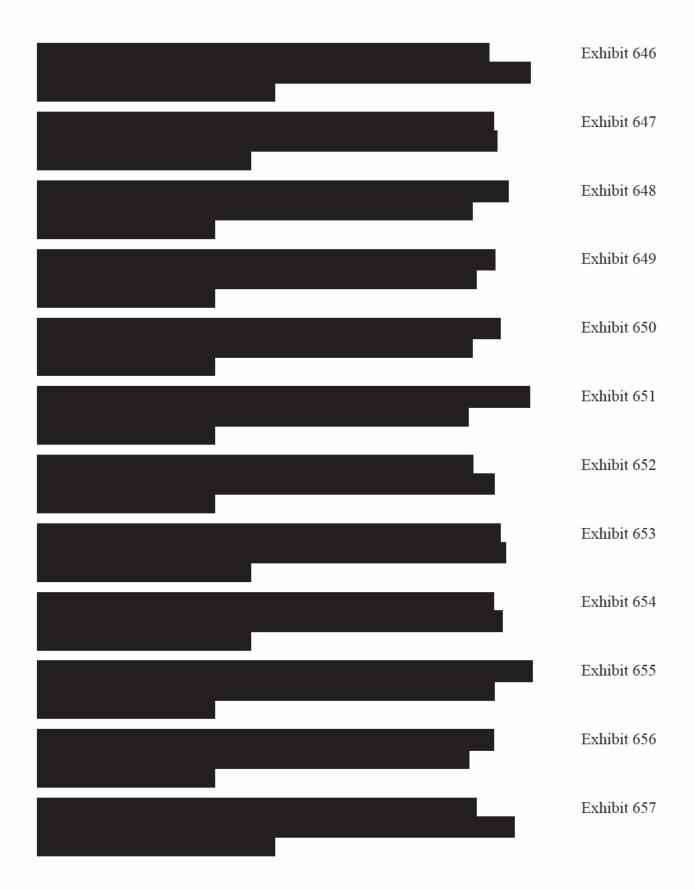


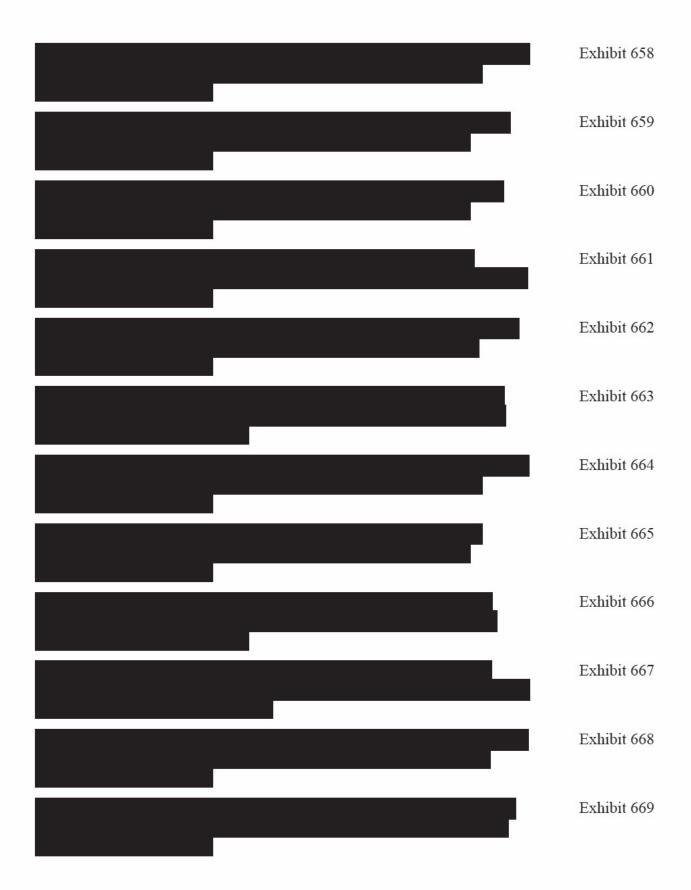


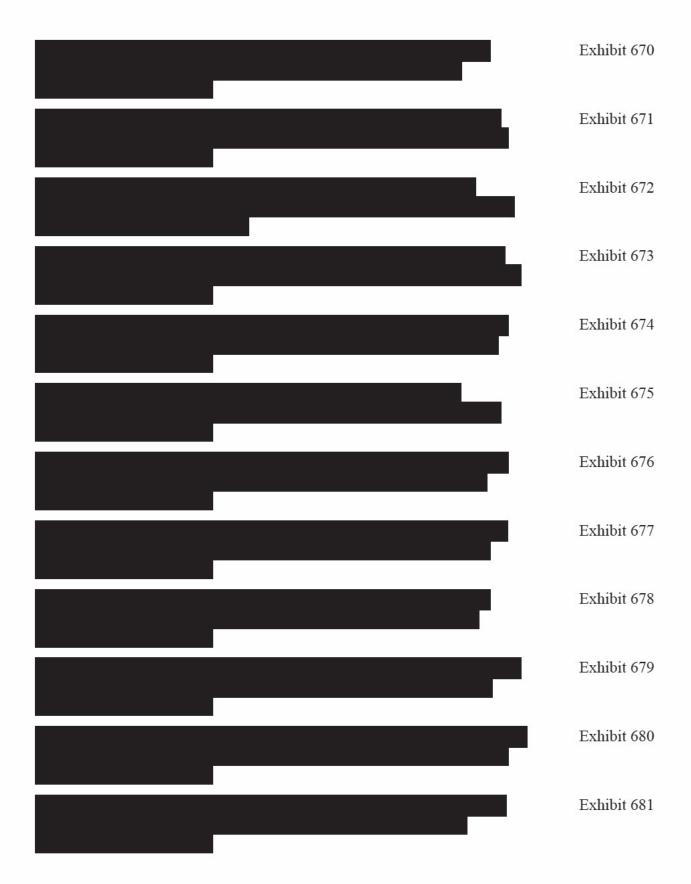


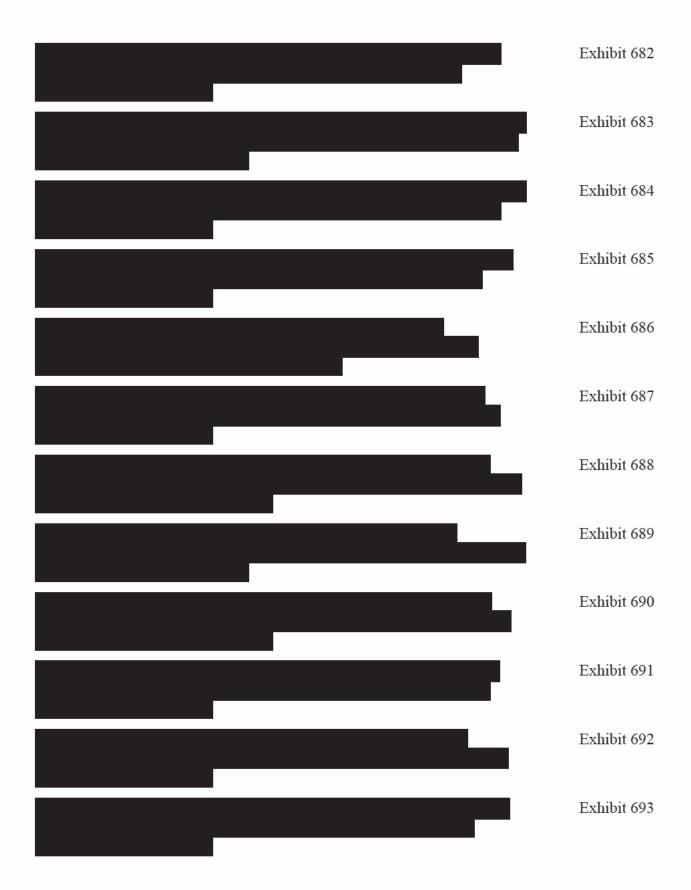


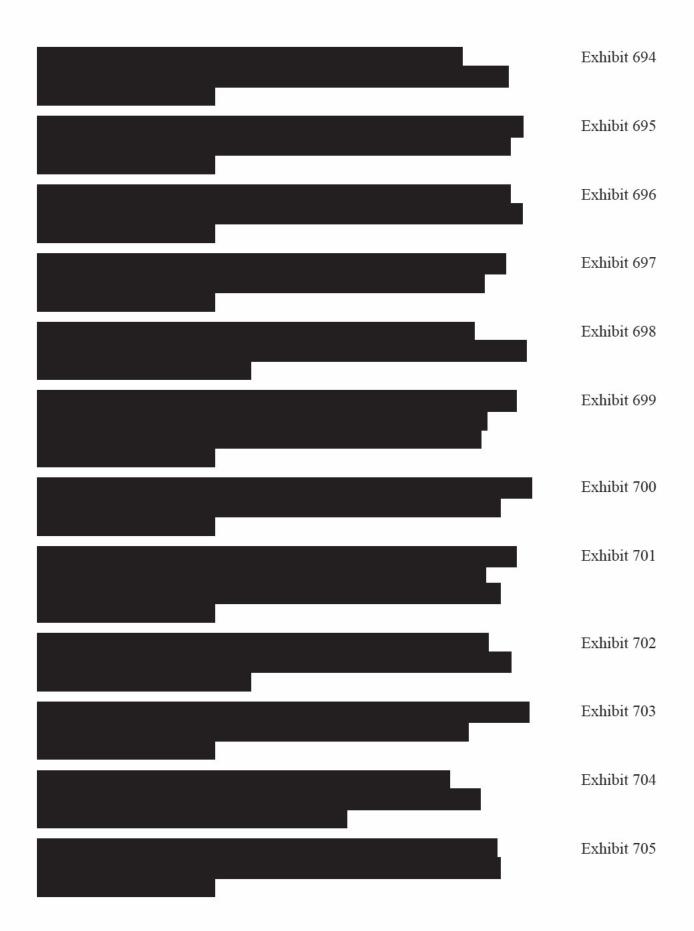






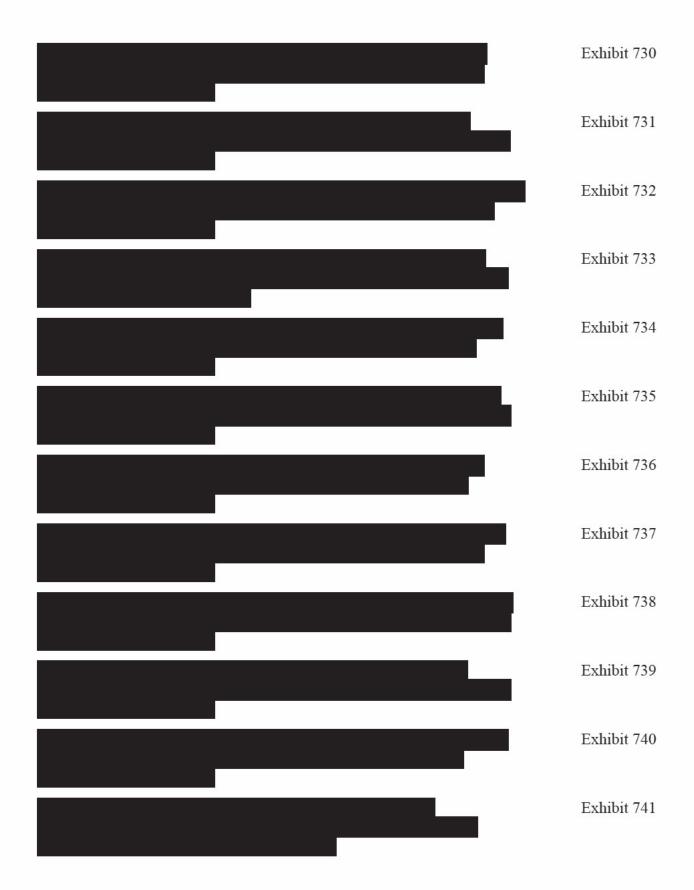


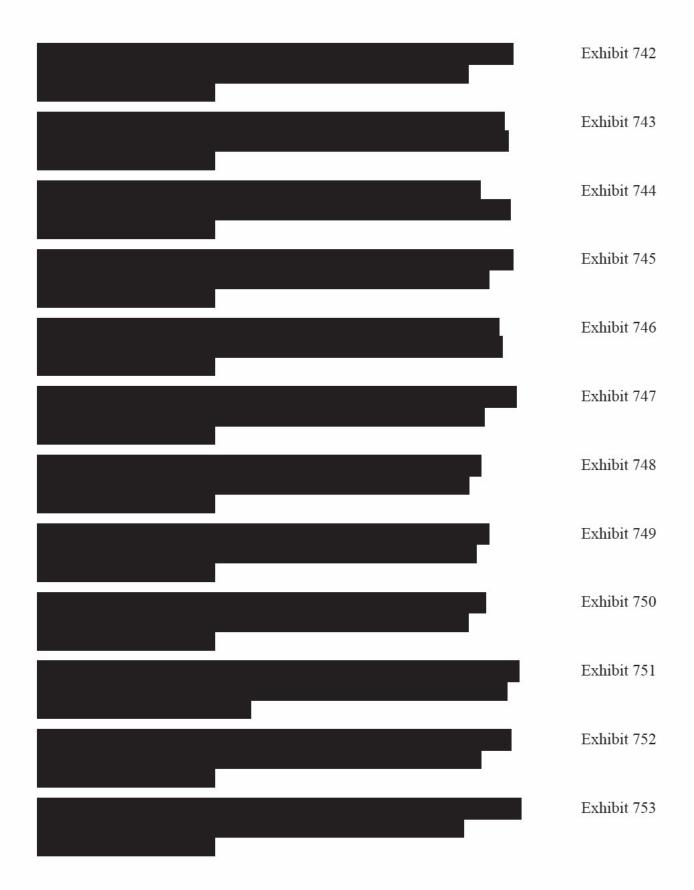


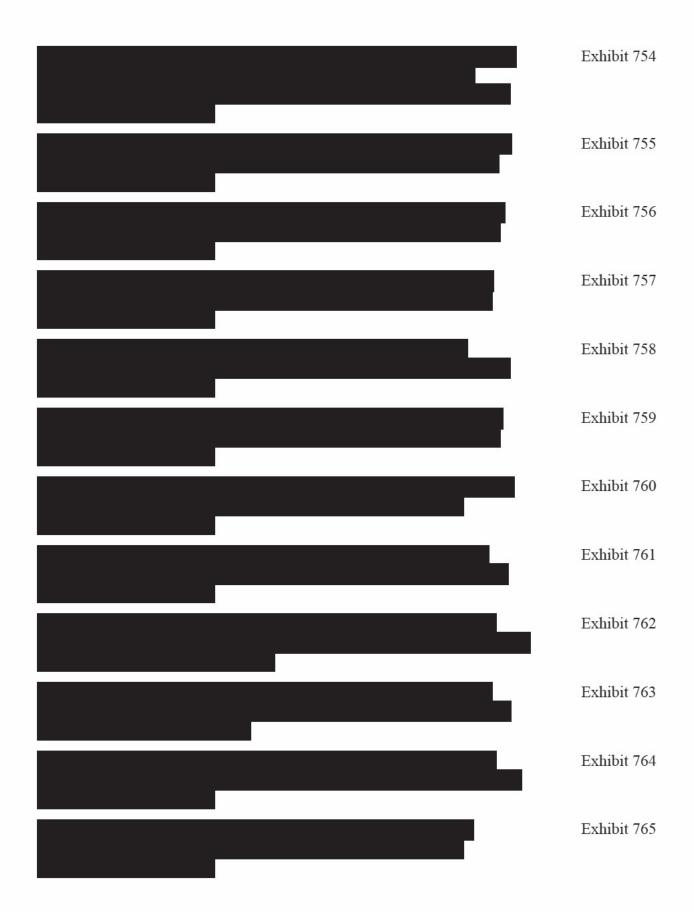




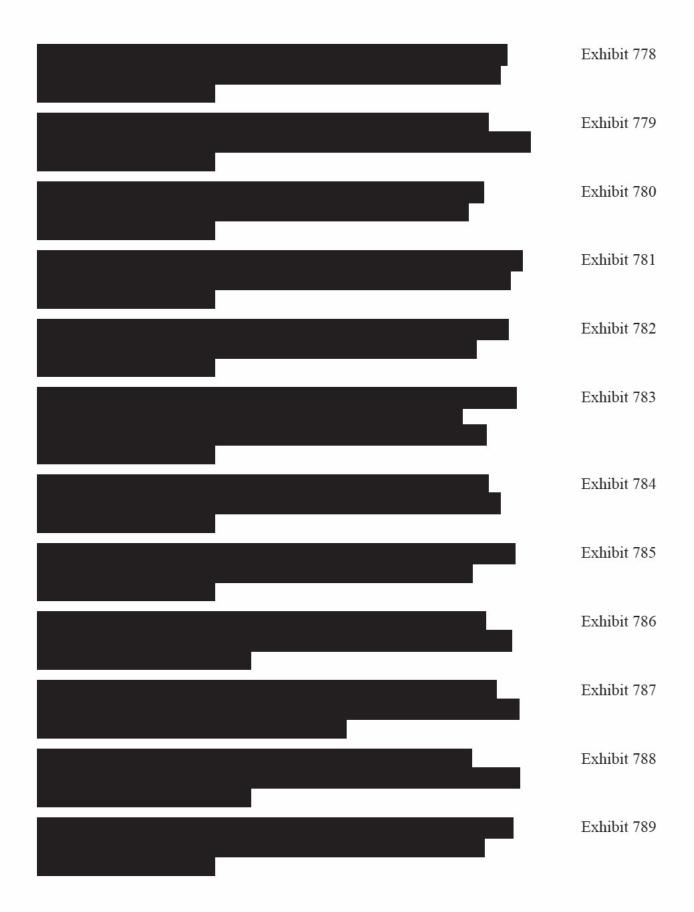


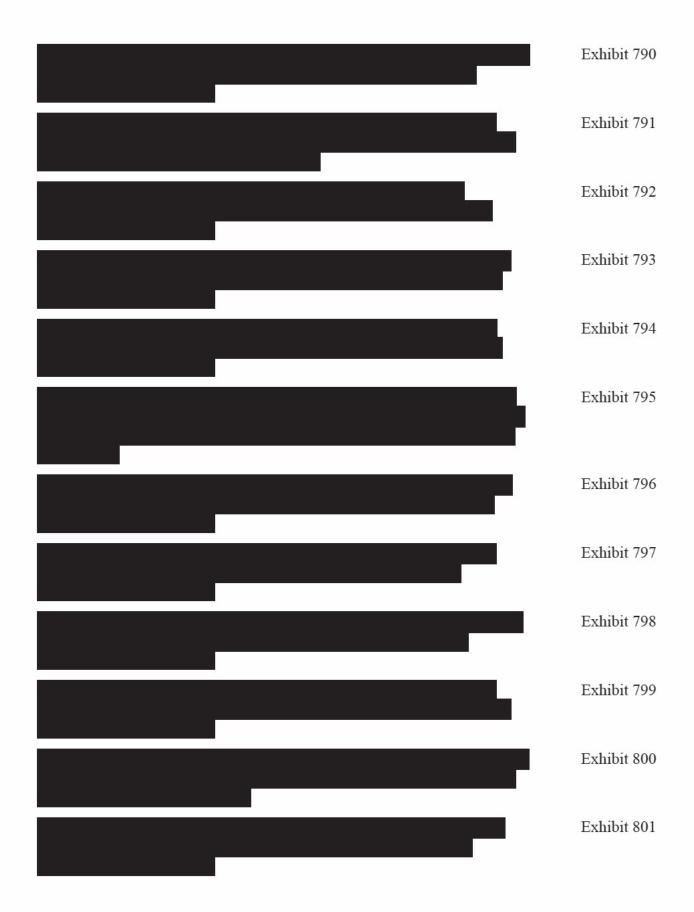


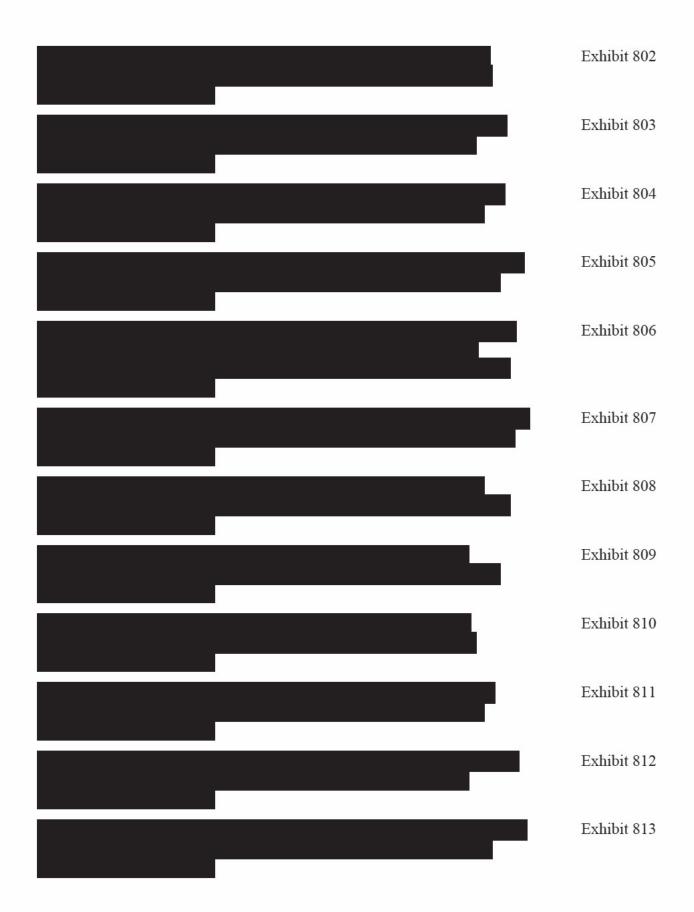


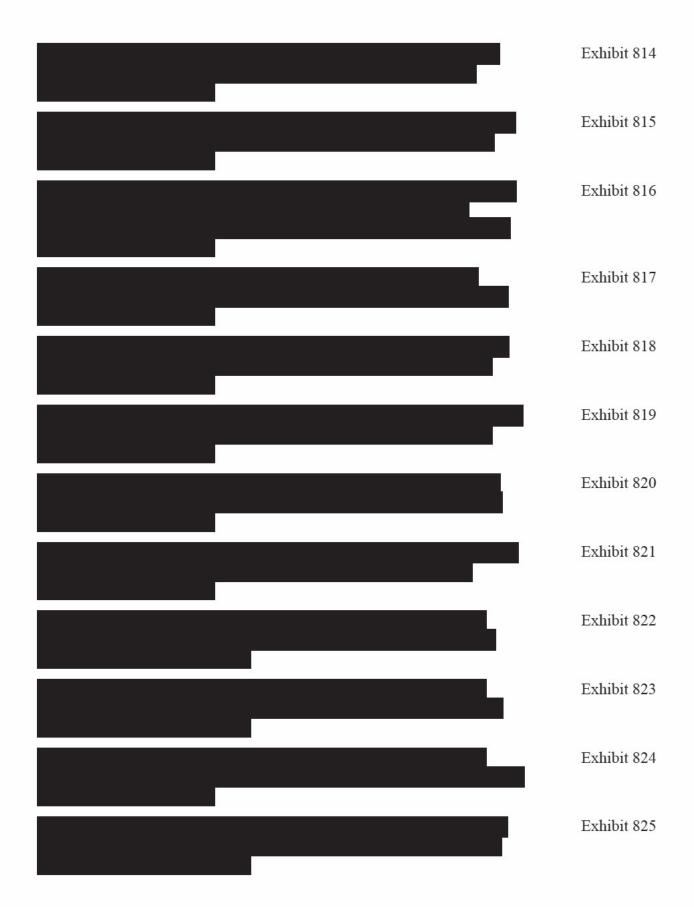


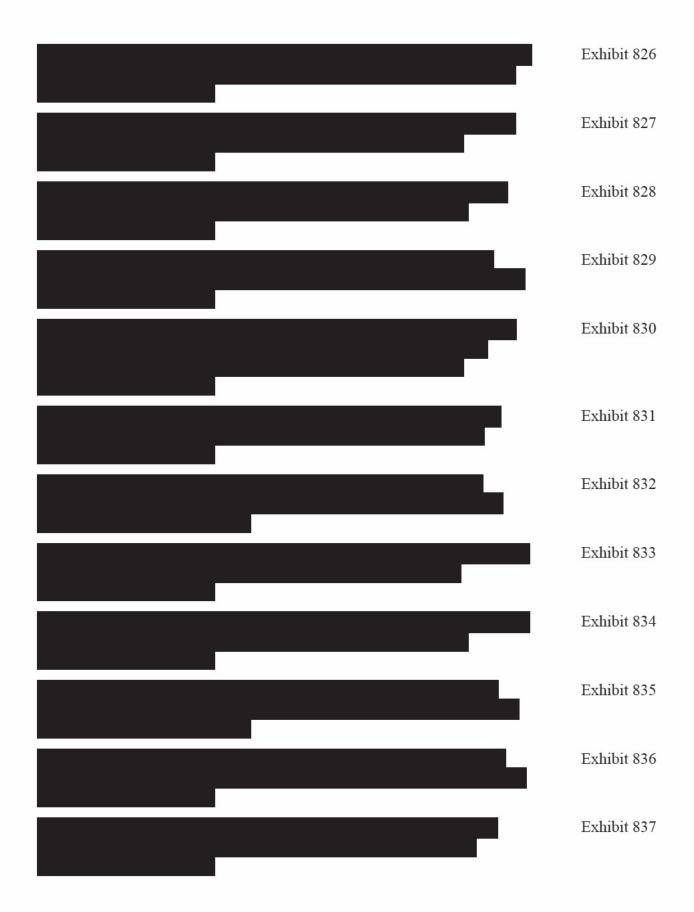




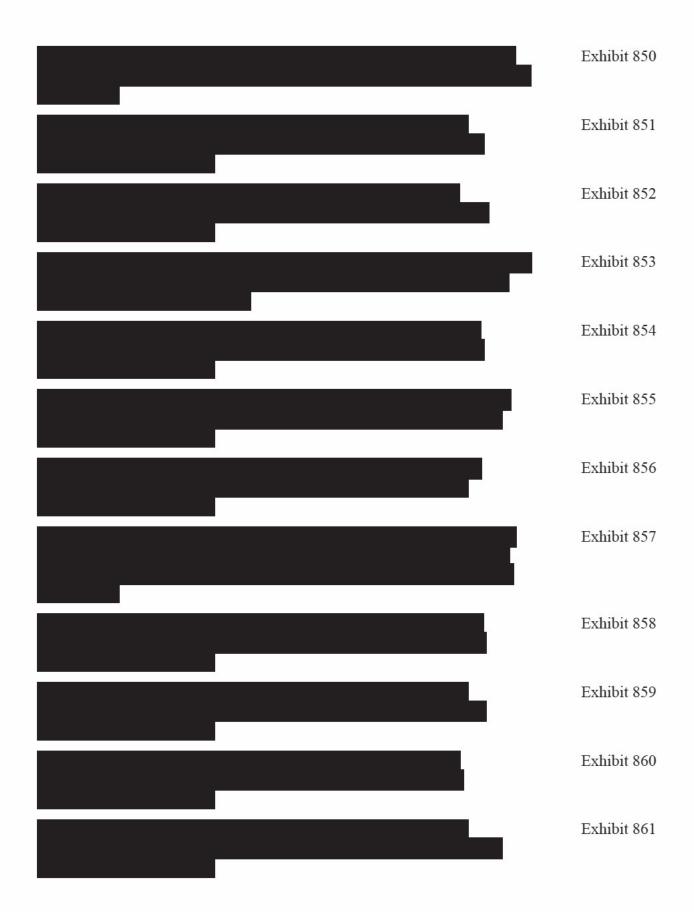


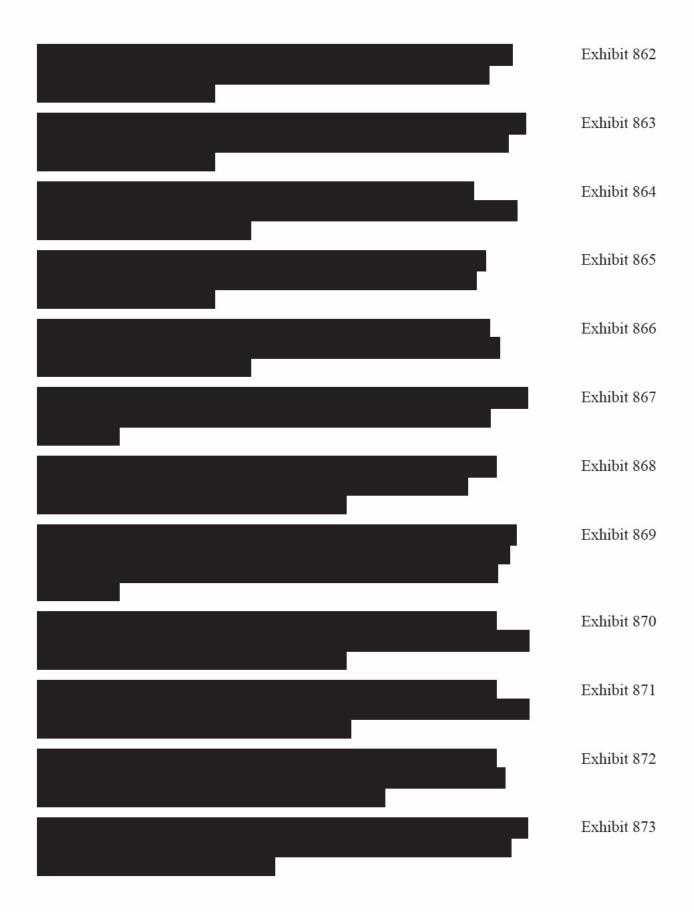


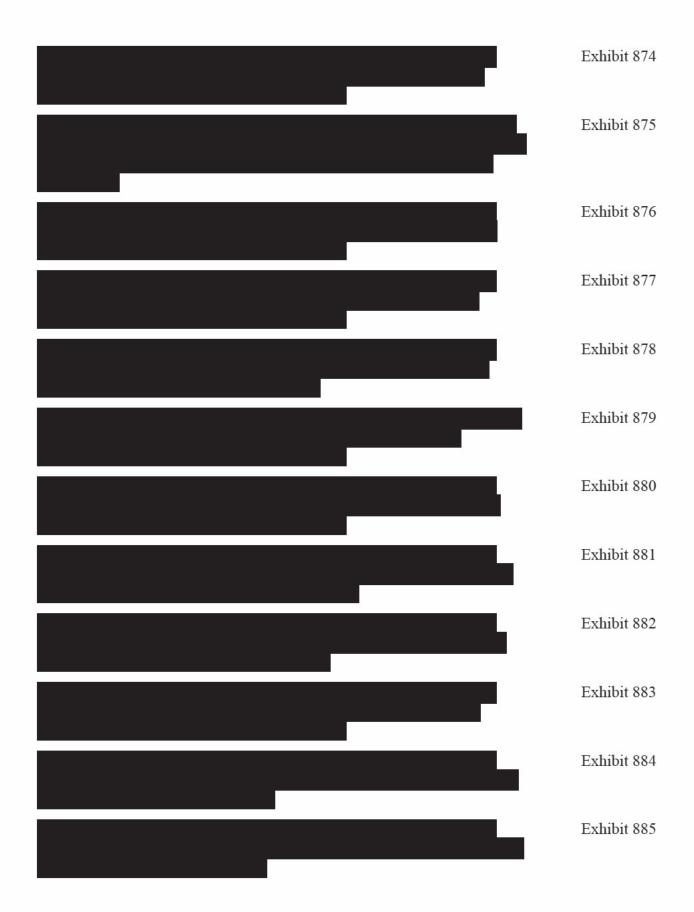


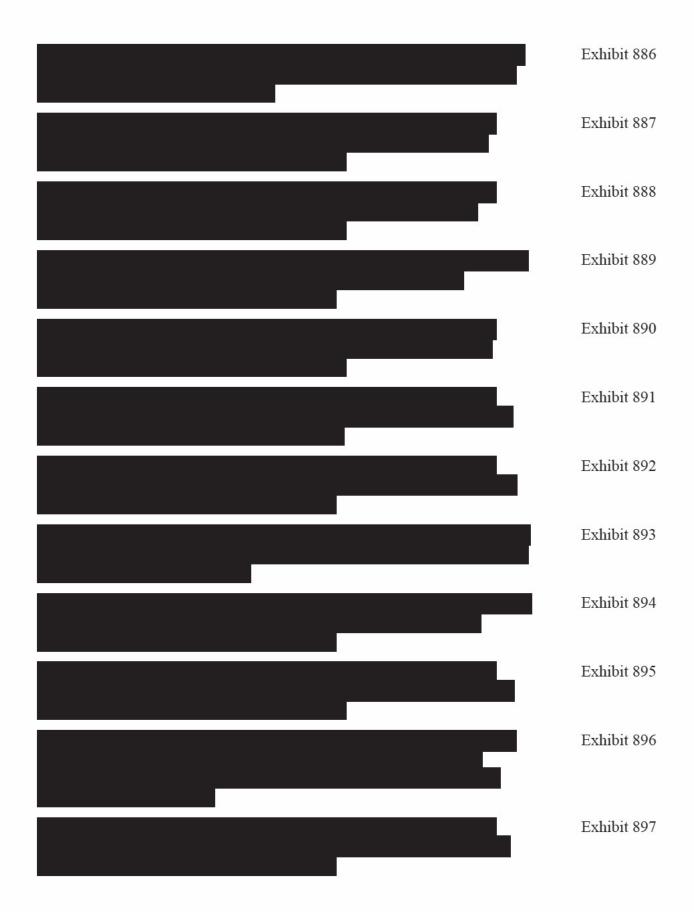


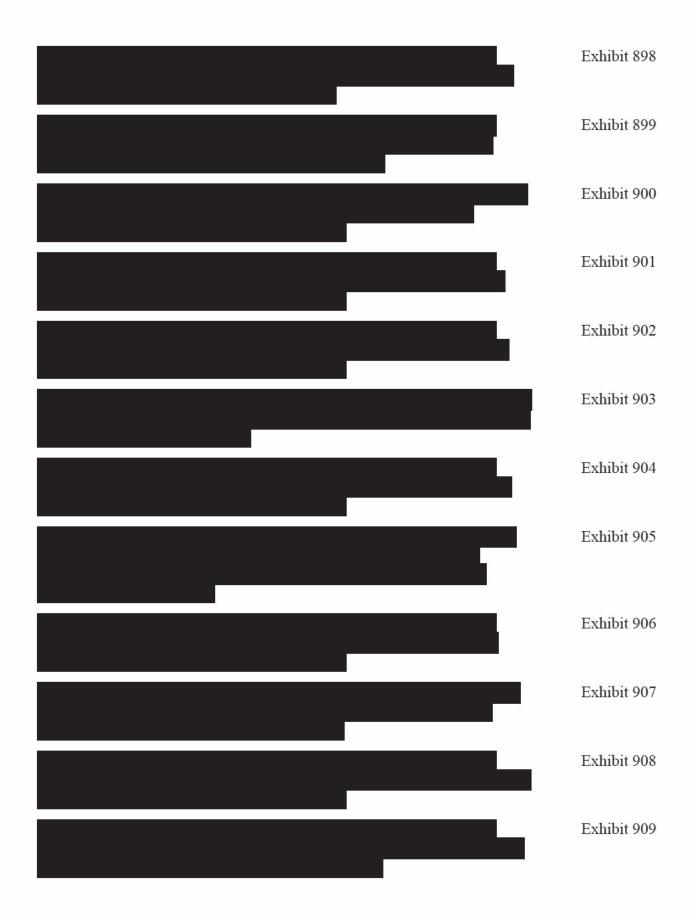


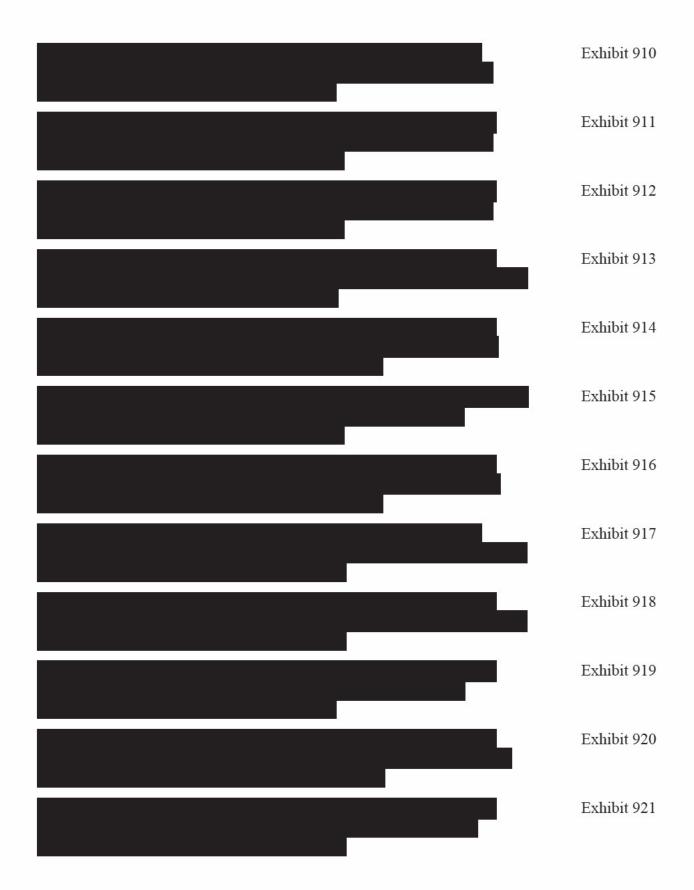


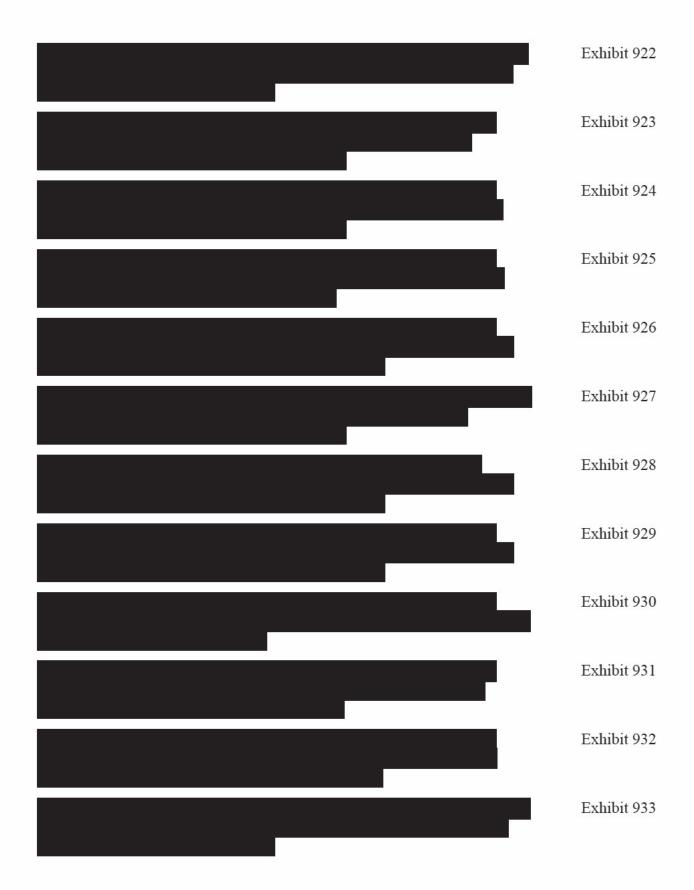


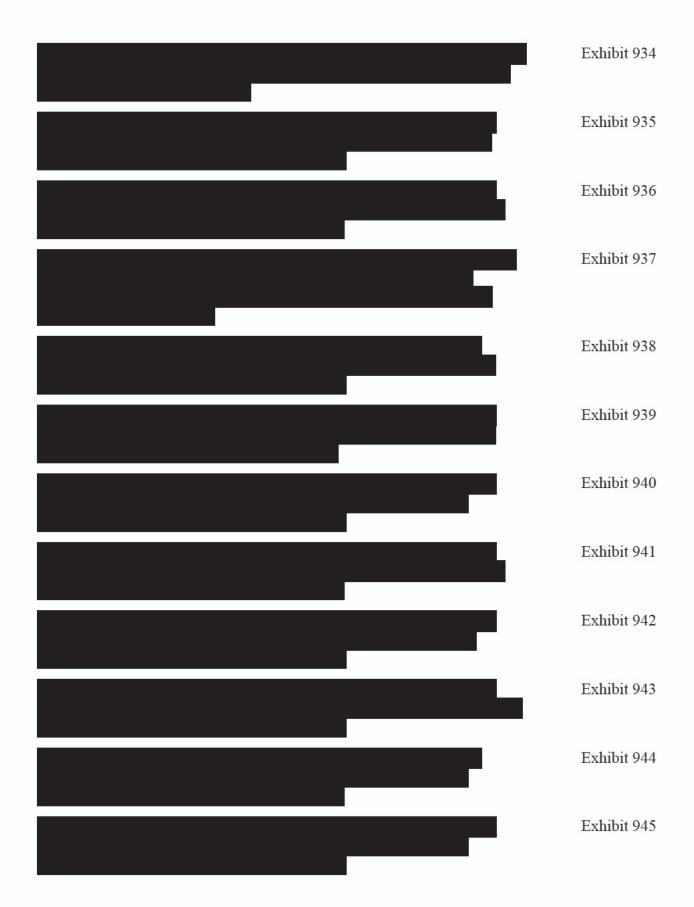


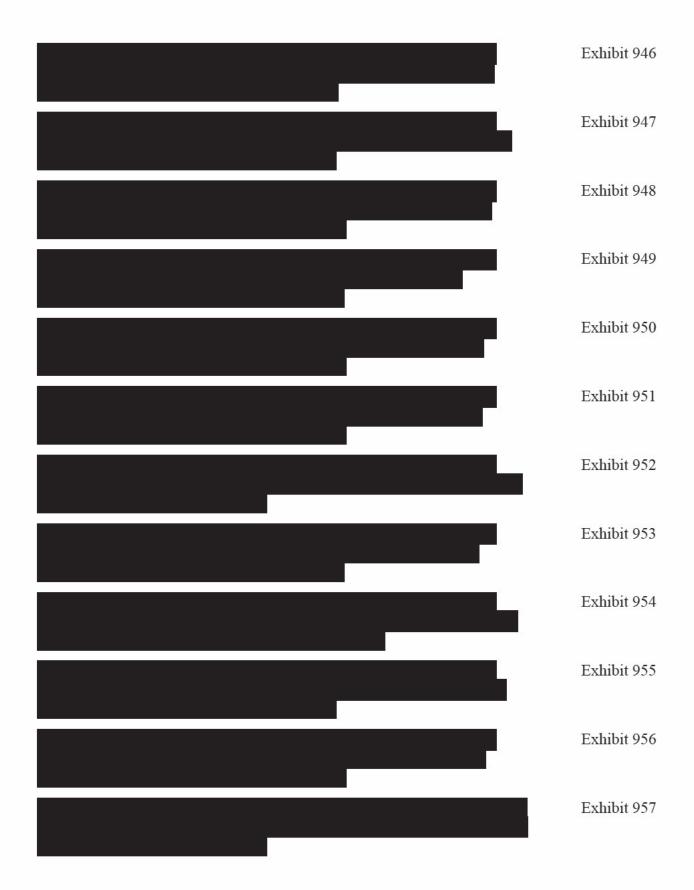


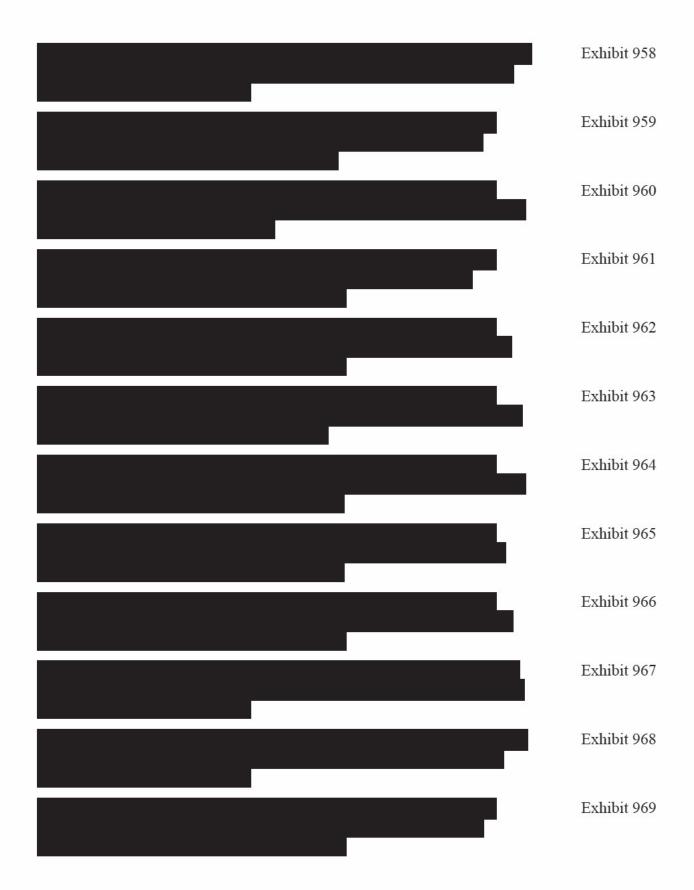


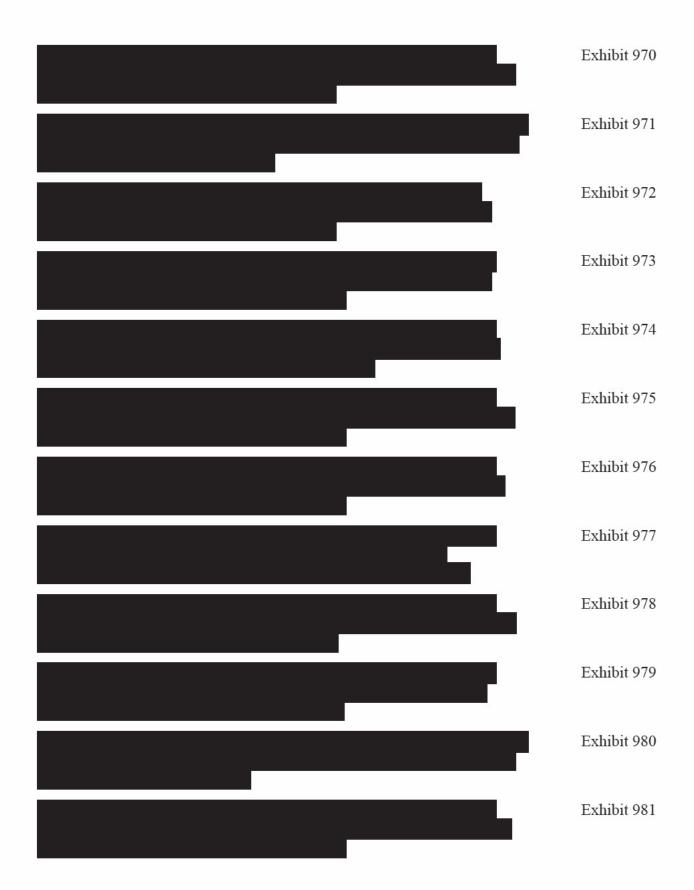


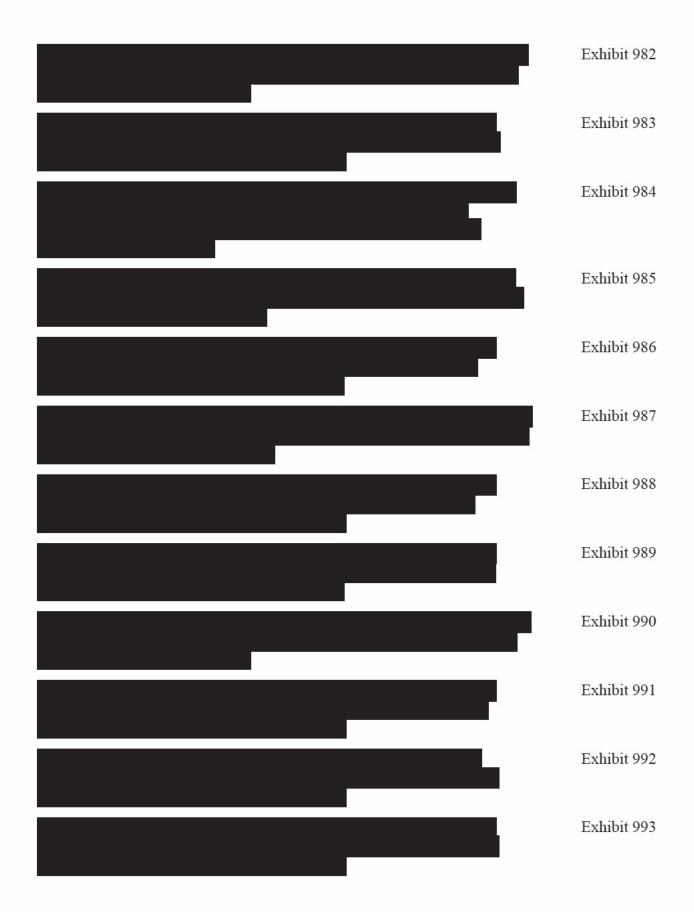


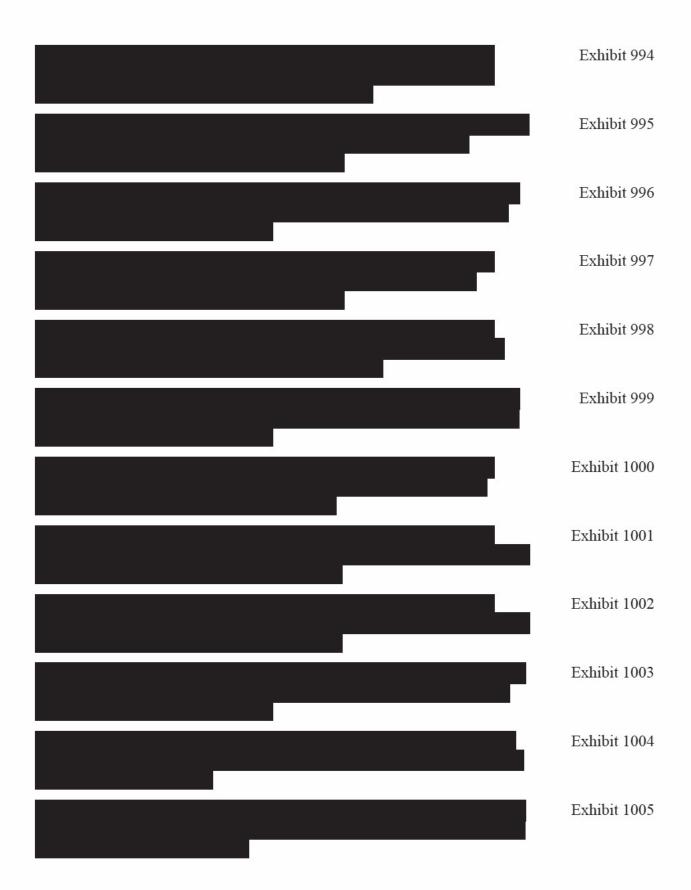


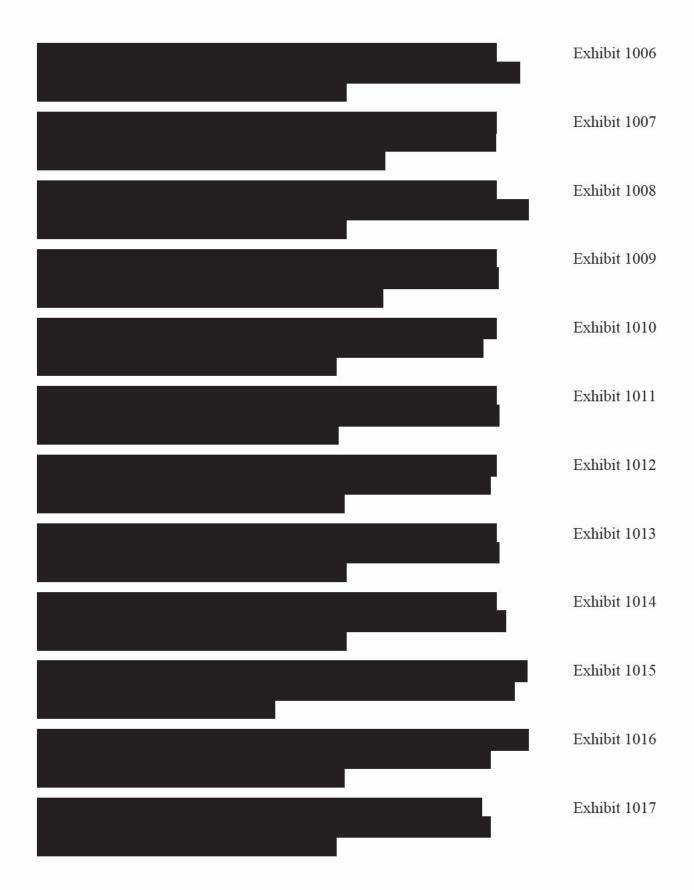


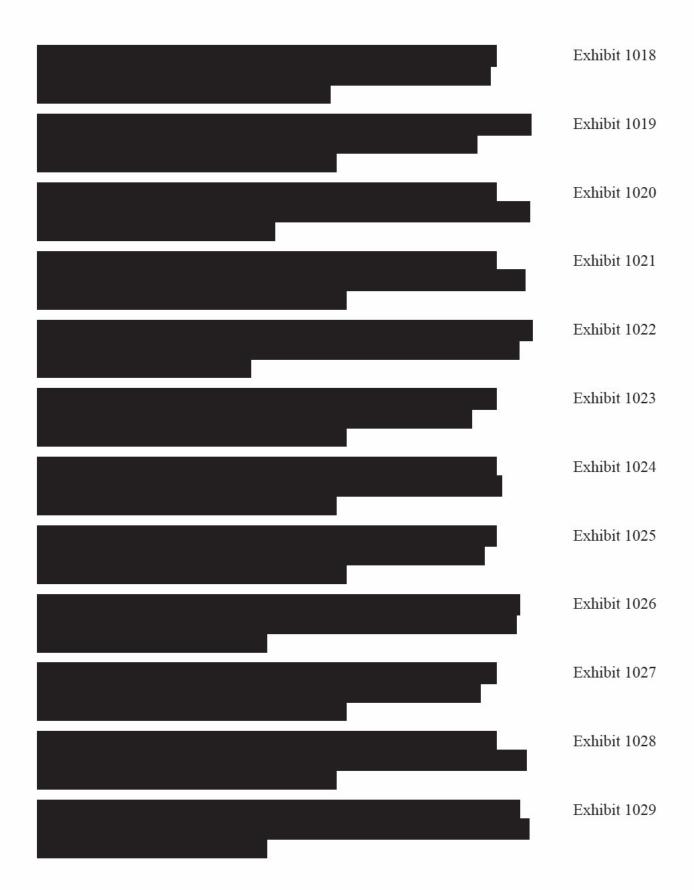


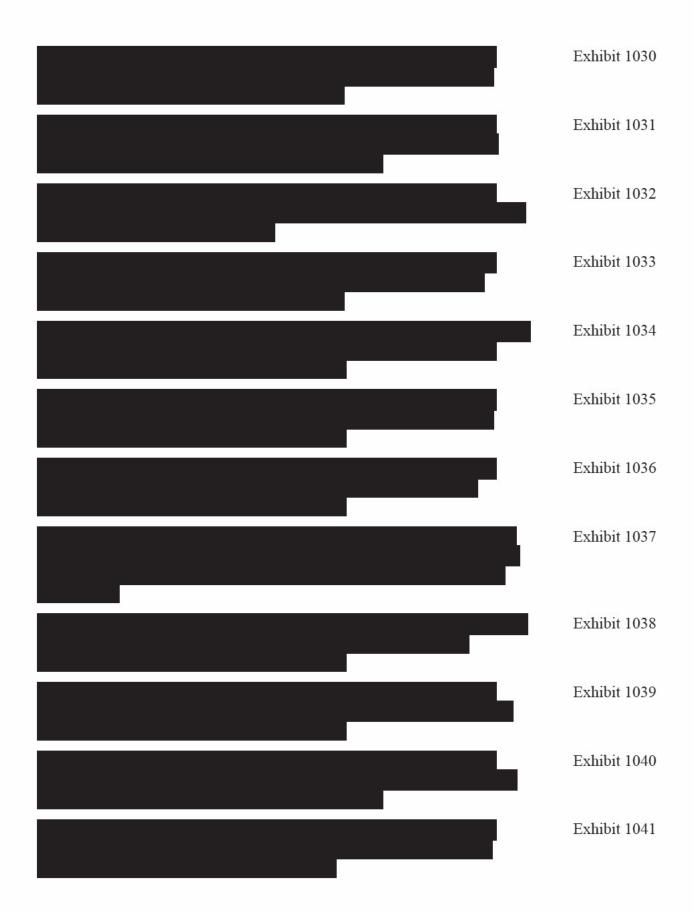


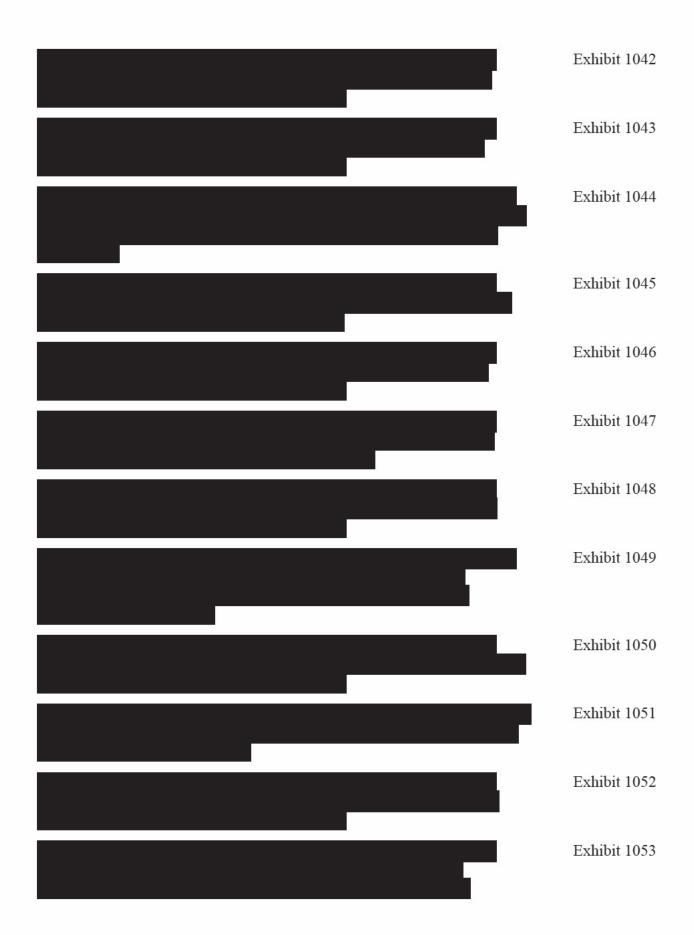


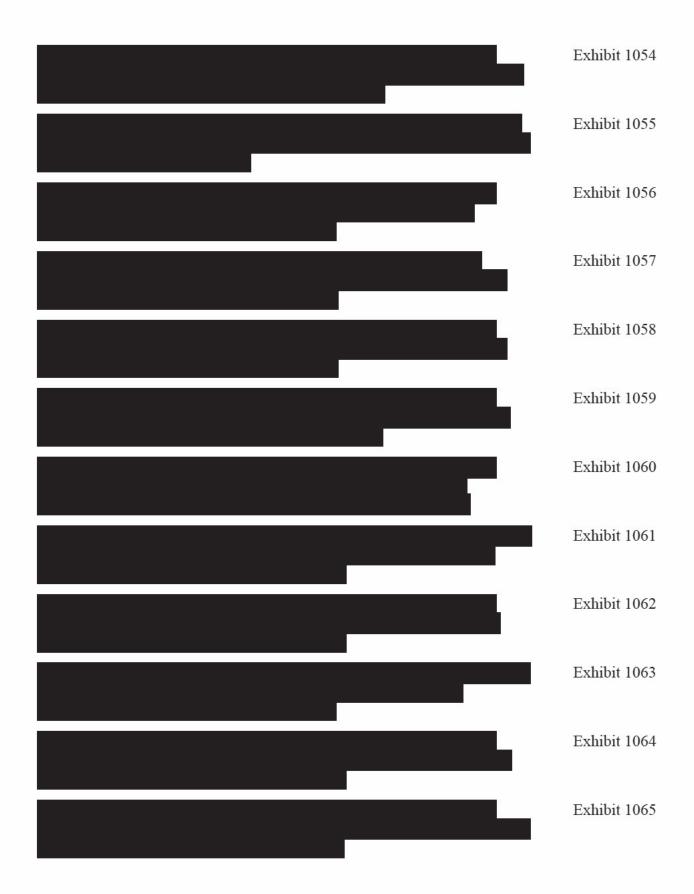


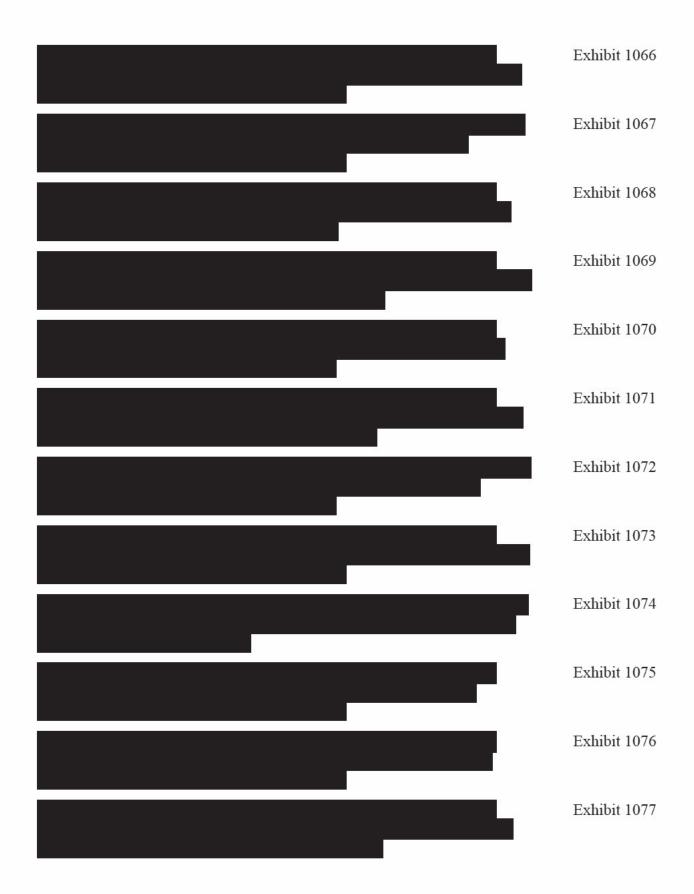


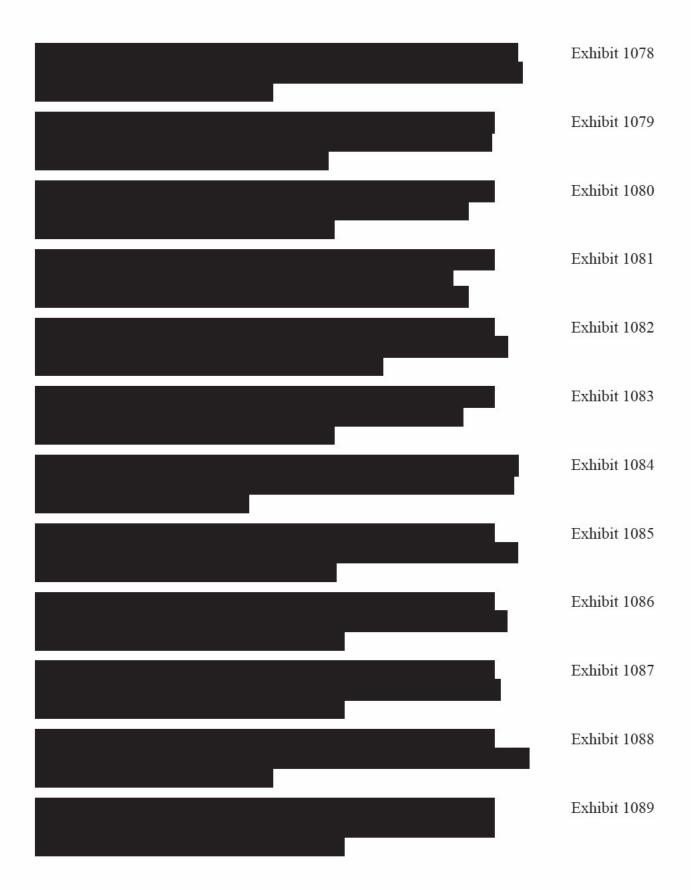


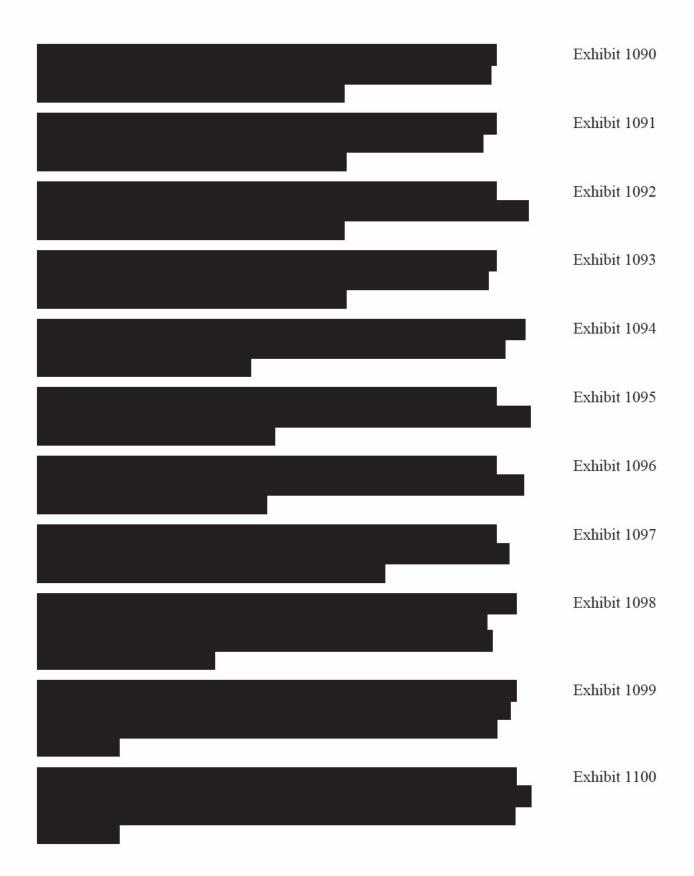


















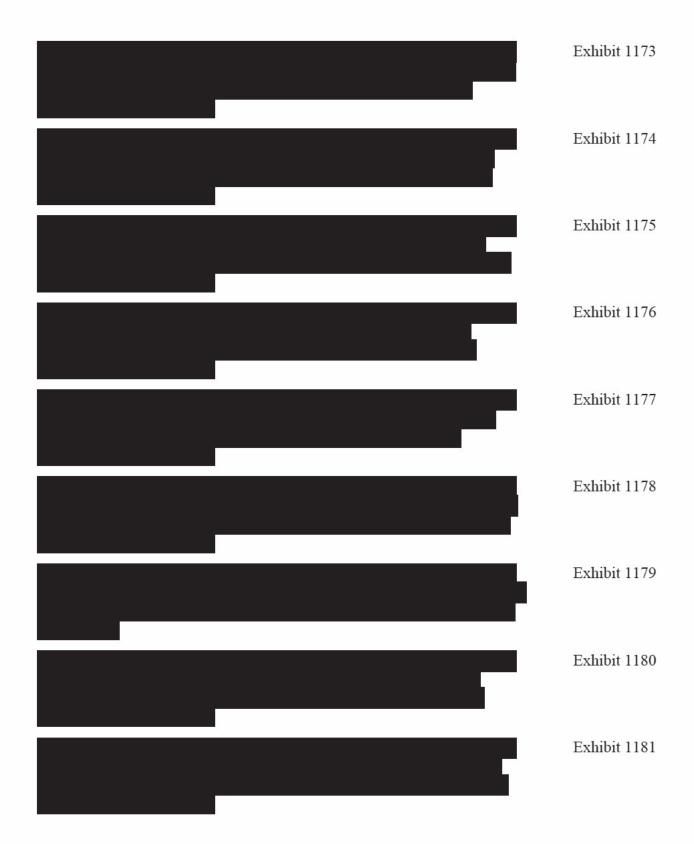










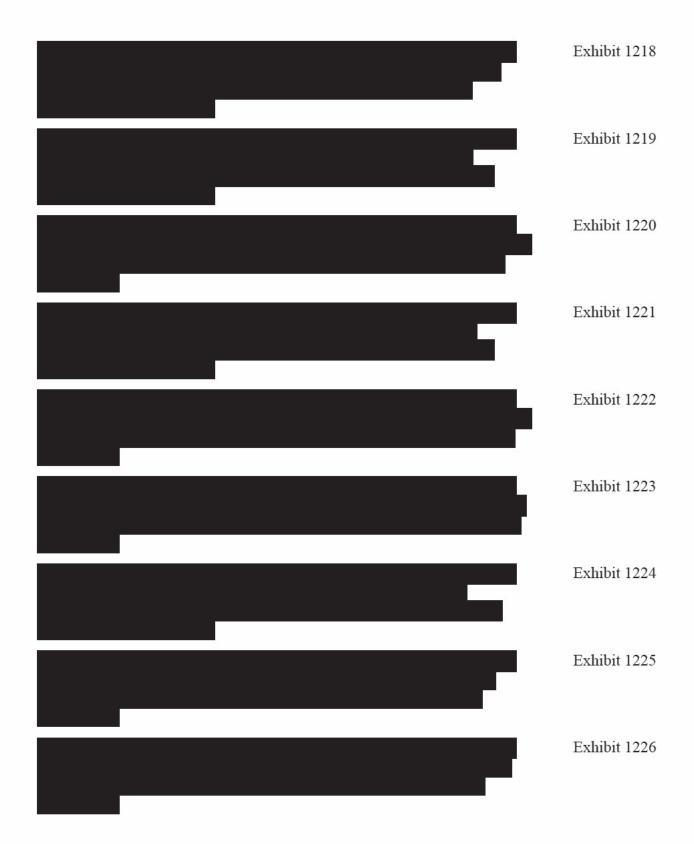


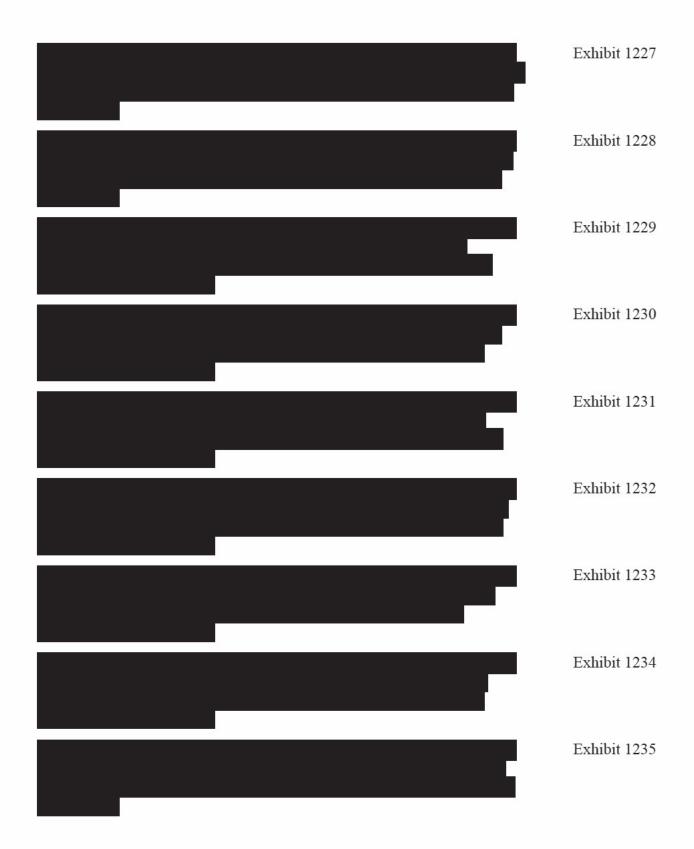






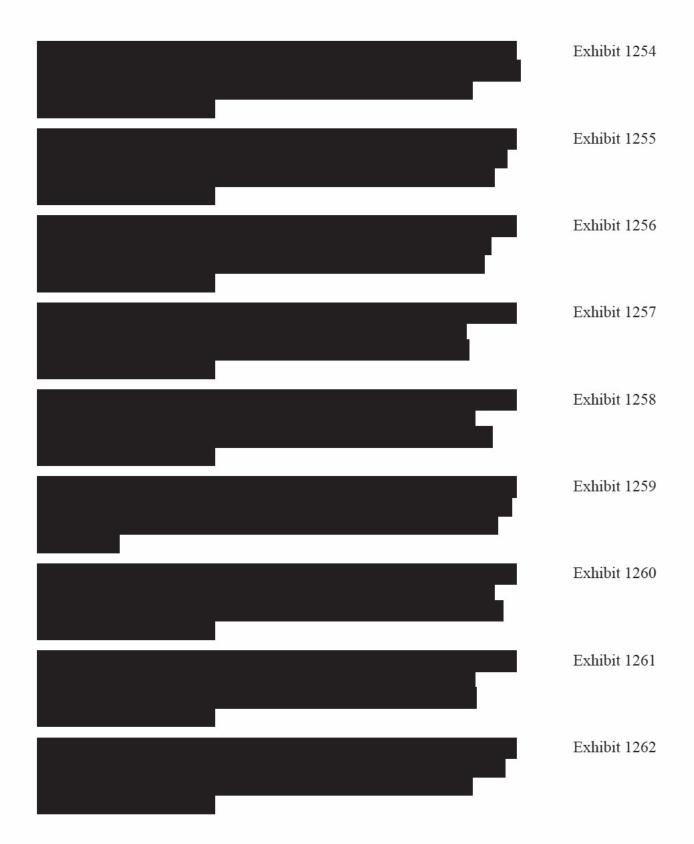














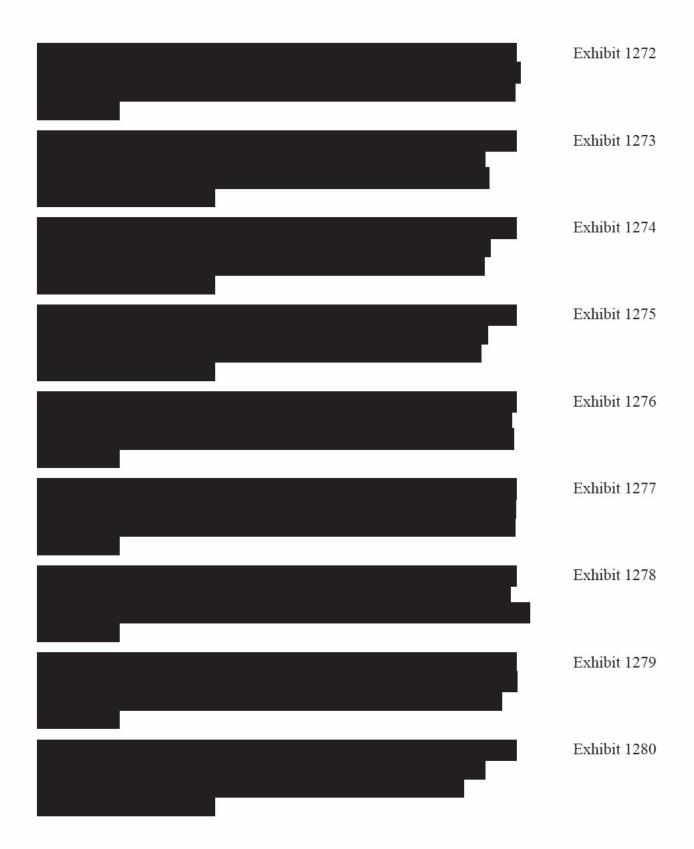


	Exhibit 1281
	Exhibit 1282
	Exhibit 1283
	Exhibit 1284
Signature Card for 2017 Broad-Based Awards and Consent to Receive Electronic Delivery Executed by [Employee Identification Number], dated	Exhibit 1285
Signature Card for 2016 Year-End Awards and Consent to Receive Electronic Delivery Executed by Identification Number (Employee Identification Number)	Exhibit 1286
Signature Card for 2017 Year-End Awards and Consent to Receive Electronic Delivery Executed by (Employee Identification Number , dated	Exhibit 1287
Signature Card for 2016 Mid-Year Awards and Consent to Receive Electronic Delivery Executed by Number (Employee Identification Number (Attention)	Exhibit 1288
Signature Card for 2015 Year-End Awards and Consent to Receive Electronic Delivery Executed by Number, dated (Employee Identification	Exhibit 1289
February 5, 2019 Letter from Robert J. Giuffra, Jr. to to Kelly M. Dermody and Adam T. Klein regarding	Exhibit 1290
February 5, 2019 Letter from Robert J. Giuffra, Jr. to to Kelly M. Dermody and Adam T. Klein regarding	Exhibit 1291
February 5, 2019 Letter from Robert J. Giuffra, Jr. to to Kelly M. Dermody and Adam T. Klein regarding	Exhibit 1292

February 5, 2019 Letter from Robert J. Giuffra, Jr. to to Kelly M. Dermody and Adam T. Klein regarding	Exhibit 1293
February 5, 2019 Letter from Robert J. Giuffra, Jr. to Kelly M. Dermody and Adam T. Klein regarding Correspondence With Individual Counsel	Exhibit 1294
February 19, 2019 Letter from Robert J. Giuffra, Jr. to Kelly M. Dermody and Adam T. Klein regarding Correspondence With Individual Counsel	Exhibit 1295
March 14, 2019 Letter from Robert J. Giuffra, Jr. to Kelly M. Dermody and Adam T. Klein	Exhibit 1296
March 29, 2019 Letter from Robert J. Giuffra, Jr. to Kelly M. Dermody and Adam T. Klein	Exhibit 1297
April 2, 2019 Letter from Valerie D. Comenencia Ortiz to Barbara B. Brown, et al.	Exhibit 1298
April 10, 2019 Letter letter from Robert J. Giuffra, Jr. to Valerie D. Comenencia Ortiz	Exhibit 1299
Notice Distributed to Class Members on November 30, 2018	Exhibit 1300
Excerpts from document GS0099133, produced in discovery in this action	Exhibit 1301
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Dated:	April 12, 2019	
	New York, New York.	

/s/ Robert J. Giuffra, Jr.
Robert J. Giuffra, Jr.